

CFP Board's *Standards of Professional Conduct*: Frequently Asked Questions

INTRODUCTION

This document of answers to Frequently Asked Questions (FAQs) concerning CFP Board's *Standards of Professional Conduct* (*Standards*) differs from the previous version in several ways. The answers are generally shorter and easier to understand. Arranged by topic, these FAQs provide a way for CFP® professionals to quickly locate information that may help to assure compliance with the *Standards*. The revised FAQs derive from the efforts of CFP Board's Business Model Working Group in 2010. The Working Group consists of volunteers from the compliance and financial planning departments of more than 20 financial services firms, as well as CFP Board staff. The twelve topic areas are:

Financial Planning – Look here for questions about whether an engagement is financial planning and the specific requirements of financial planning engagements.

Fiduciary Duty – Look here to understand CFP Board's fiduciary standard of care and how it is applied.

Disclosure & Written Agreement – Financial Planning – Look here to learn more about the specific disclosure requirements when providing financial planning.

Disclosure – Non-Financial Planning – Look here to learn more about the specific disclosure requirements when not providing financial planning.

Principal Trades & Proprietary Products – Look here to find out about the required disclosures concerning the conflicts of interest associated with these transactions.

Federal & State Regulation – Look here for questions regarding how CFP Board's *Standards* relate to current federal and state regulation.

Holding Out – Look here to determine when the *Standards* apply.

Team Arrangements – Answers questions regarding how to apply the *Standards* to team practices.

Terminating Engagements – Look here to learn more about how to end a financial planning relationship.

Firm Obligations – This section clarifies CFP Board's enforcement activity regarding employers and firms.

Liability – Look here to learn how CFP Board's *Standards* affect your liability.

Why Revise the Standards? – Look here to learn why CFP Board periodically makes changes to the *Standards*.

CFP Board wants all CFP® professionals to have a thorough understanding of the *Standards of Professional Conduct*. Questions not answered in these FAQs may be sent to standards@CFPBoard.org for consideration and possible inclusion in future revisions of this document.



INDEX

Financial Planning

[Question 1-1](#): How does CFP Board define financial planning?

[Question 1-2](#): Will CFP Board consider an engagement to be financial planning solely because the CFP® professional used the six-step process?

[Question 1-3](#): Does CFP Board require CFP® professionals to address a certain number of subject areas for the engagement to be considered financial planning?

[Question 1-4](#): Does CFP Board require CFP® professionals to address particular subject areas in order for the engagement to be considered financial planning?

[Question 1-5](#): Does CFP Board require CFP® professionals to complete all six steps for an engagement to be considered financial planning?

[Question 1-6](#): Will CFP Board consider future engagements to be financial planning because the CFP® professional provided financial planning to the same client(s)?

[Question 1-7](#): Will CFP Board consider an engagement to be financial planning solely based on the compensation model used by the CFP® professional?

[Question 1-8](#): What types of activities are considered “material elements of financial planning”?

[Question 1-9](#): How can CFP® professionals determine when a specific service or activity rises to the level of financial planning?

[Question 1-10](#): What should I do if I am unsure whether a specific service or activity rises to the level of financial planning?

[Question 1-11](#): What distinctions do the *Standards* make between financial planning services and other services that don’t rise to the level of financial planning?

[Question 1-12](#): Does conducting a needs analysis or suitability review reach the level of financial planning or material elements of financial planning?

[Question 1-13](#): How many elements of the financial planning process can a CFP® professional provide without having those activities constitute “material elements of financial planning”?

[Question 1-14](#): How many financial planning subject areas can a CFP® professional address with a client without reaching the level of “material elements of financial planning”?

[Question 1-15](#): In situations where a CFP® professional implements financial planning recommendations prepared by a third party, will the CFP® professional’s implementation activities be considered financial planning or material elements of financial planning?

[Question 1-16](#): Is a CFP® professional who provides financial planning services more likely to be disciplined by CFP Board than a CFP® professional who does not provide financial planning services?

Fiduciary Care

[Question 2-1](#): Why doesn't CFP Board just say that all CFP® professionals are fiduciaries?

[Question 2-2](#): How can a CFP® professional be certain that a recommendation is the “best” for a client, given the enormous variety of financial strategies and products available? Does CFP Board expect CFP® professionals to investigate every conceivable option that might be available to a particular client?

[Question 2-3](#): Is it possible for a CFP® professional to be subject to two different standards of care at the same time under CFP Board *Rules of Conduct*?

Disclosures and Written Agreement Required When Providing Financial Planning

[Question 3-1](#): What disclosures do the *Standards* require for client engagements that do involve financial planning or material elements of financial planning?

[Question 3-2](#): When, what and how does CFP Board require disclosure to clients and prospective clients when providing financial planning?

[Question 3-3](#): Does CFP Board expect CFP® professionals to hand deliver disclosure documents, or can the documents be posted or delivered on a CFP® professional's or the CFP® professional's employer's Web site?

[Question 3-4](#): When should a CFP® professional send out disclosure documents to clients?

[Question 3-5](#): In what ways are the disclosures required by the current *Standards* different from the disclosure requirements in the former *Standards*?

[Question 3-6](#): How does a CFP® professional disclose compensation?

[Question 3-7](#): What does CFP Board mean by “costs” and “any other sources of compensation”?

[Question 3-8](#): Is any additional written documentation required by the *Standards*?

[Question 3-9](#): Will CFP Board provide sample agreements and disclosures that CFP® professionals can use with their clients?

Disclosures Required When Not Providing Financial Planning

[Question 4-1](#): What disclosures do the *Standards* require for client engagements that do not involve financial planning or material elements of financial planning?

[Question 4-2](#): When, what and how does CFP Board require disclosure to clients and prospective clients when not providing financial planning?

[Question 4-3](#): Does a CFP® professional who is not providing financial planning or using the financial planning process need to provide clients or prospective clients with written disclosure documents?

Principal Trades & Proprietary Products

[Question 5-1](#): How do the *Standards* relate to CFP® professionals who provide clients principal-trade transactions?

[Question 5-2](#): Do the *Standards* apply to CFP® professionals who recommend or sell proprietary financial products?

Other Regulations

[Question 6-1](#): How do the *Standards* relate to federal and state statutes, rules, regulations and case law with respect to the obligations of a CFP® professional?

[Question 6-2](#): Why doesn't CFP Board use the same definitions used by federal and state regulators and courts for important terms such as "financial planning" and "fiduciary"?

[Question 6-3](#): Will the *Standards* be applied differently for CFP® professionals with different licenses or registrations (such as registered representatives, investment adviser representatives, insurance agents)?

Holding Out

[Question 7-1](#): Do the *Standards* apply to those who hold CFP® certification but who do not display the CFP® marks or hold themselves out as financial planners?

Team Arrangement

[Question 8-1](#): How do the *Standards* relate to CFP® professionals who provide services as part of a team arrangement?

Terminating the Engagement

[Question 9-1](#): Is it possible for a client of a CFP® professional to terminate the financial planning engagement with the CFP® professional and still receive other services from the CFP® professional?

Firm Obligations

[Question 10-1](#): Are firms required to ensure that their employees and representatives who hold the CFP® certification adhere to CFP Board's ethical standards?

Liability

[Question 11-1](#): Do the *Standards* increase liability for CFP® professionals?

Why Revise the *Standards*?

[Question 12-1](#): Why did CFP Board revise the ethical standards for CFP® professionals?

[Question 12-2](#): Are the current *Standards* stronger than the former *Standards*?

FINANCIAL PLANNING

Question 1-1: How does CFP Board define financial planning?

The *Standards of Professional Conduct (Standards)* define financial planning as “the process of determining whether and how an individual can meet life goals through the proper management of financial resources. Financial planning integrates the financial planning process with the financial planning subject areas.”

There are six steps to the financial planning process:

1. Establishing and defining the client-planner relationship
2. Gathering client data including goals
3. Analyzing and evaluating the client’s current financial status
4. Developing and presenting recommendations and/or alternatives
5. Implementing the recommendations
6. Monitoring the recommendations

“Financial planning subject areas” denotes the basic subject fields covered in the financial planning process which typically include, but are not limited to:

- Financial statement preparation and analysis (including cash flow analysis/planning and budgeting)
- Insurance planning and risk management
- Employee benefits planning
- Investment planning
- Income tax planning
- Retirement planning
- Estate planning

Question 1-2: Will CFP Board consider an engagement to be financial planning solely because the CFP® professional used the six-step process?

No. CFP Board recognizes that the six steps are not unique to the financial planning process and may occur in connection with other activities such as brokerage, investment advisory and/or insurance products or services. Examples include gathering client information as part of a suitability analysis, making recommendations of various brokerage, investment advisory or insurance products or services, and implementing such recommendations.

Question 1-3: Does CFP Board require CFP® professionals to address a certain number of subject areas for the engagement to be considered financial planning?

No, CFP Board does not identify a minimum number of subject areas for an engagement to be considered financial planning. While it is more likely for financial planning to exist when multiple subject areas are involved, in some circumstances a financial planning engagement may exist even when a single subject area is involved. For example, a financial planning engagement may exist when a client requests a comprehensive retirement plan or requires a complex estate plan. In determining whether a financial planning engagement exists, CFP Board considers the circumstances involved and, in particular, the following factors:

- The client’s understanding and intent in engaging the CFP® professional
- The degree to which multiple financial planning subject areas are involved
- The comprehensiveness of data gathering
- The breadth and depth of recommendations

Question 1-4: Does CFP Board require CFP® professionals to address particular subject areas in order for the engagement to be considered financial planning?

No, CFP Board does not require CFP® professionals to address particular subject areas with each client. It is important to note that while some may consider financial planning as consisting essentially of investment planning, retirement planning or estate planning, these “financial planning subject areas” may or may not be part of the financial planning process as it is applied to a specific client’s situation. When attempting to determine if an engagement is financial planning, one should focus on the degree of integration between the financial planning process and the subject areas. Greater degrees of integration are more likely to be considered financial planning than lesser degrees of integration. In determining whether a financial planning engagement exists, CFP Board considers the circumstances involved and, in particular, the following factors:

- The client’s understanding and intent in engaging the CFP® professional
- The degree to which multiple financial planning subject areas are involved

- The comprehensiveness of data gathering
- The breadth and depth of recommendations

Question 1-5: Does CFP Board require CFP® professionals to complete all six steps for an engagement to be considered financial planning?

No, it is not necessary for each of the six steps to be followed in order for a financial planning engagement to exist. For example, some clients may ask a CFP® professional to provide financial planning recommendations and then work with another financial services provider to implement those recommendations. Other clients may ask a CFP® professional to assist them with the implementation of specific investments or strategies, or to review only one aspect of the client's financial situation, such as estate issues or insurance needs. While these examples do not include all six steps, they may nevertheless constitute financial planning engagements.

When determining whether a financial planning engagement exists, the entirety of a client relationship should be examined. If the services to be provided are limited in scope, that client relationship may not be a financial planning engagement. When the services provided to an individual client become financial planning or material elements of financial planning, however, the client relationship becomes a financial planning engagement. Once a CFP® professional enters into a financial planning engagement with a client, CFP Board will take into consideration the history of the relationship between the CFP® professional and the client when determining whether future services provided to that client are also financial planning.

Question 1-6: Will CFP Board consider future engagements to be financial planning because the CFP® professional provided financial planning to the same client(s)?

Yes, when the services provided to an individual client involve financial planning or material elements of financial planning, the client relationship becomes a financial planning engagement. All future services to that client are likely to be considered by CFP Board to be part of that financial planning engagement until such time as the financial planning engagement is terminated. The CFP® professional should note that in circumstances where a financial planning engagement with a particular client is terminated under the terms of a contract with the CFP® professional's firm, followed by an ongoing professional relationship between the client and the CFP® professional, the financial planning engagement with the CFP® professional may continue. If the financial planning engagement continues, so does the CFP® professional's fiduciary obligation to the client. [See Questions [1-8](#), [1-9](#), [1-10](#) and [9-1](#)]

Question 1-7: Will CFP Board consider an engagement to be financial planning solely based on the compensation model used by the CFP® professional?

No, CFP Board does not use compensation model as a determining factor when identifying whether a financial planning relationship exists. CFP Board does not advocate any particular business model or compensation arrangement. The *Standards* are compensation-neutral, and compliance with the *Standards* is possible for both CFP® professionals with fee-based practices and those who are commission- or salary-based. Regardless of a CFP® professional's compensation arrangement or business model, the *Standards* require a CFP® professional to obtain any licenses or registrations required by Federal or State authorities for the specific activities in which that individual is engaged. [See Rule 4.3] The *Standards* also require disclosure of material information about a CFP® professional's business model and the compensation arrangement related to the client engagement. [See Rules 1.2 and 2.2]

Question 1-8: What types of activities are considered "material elements of financial planning"?

CFP Board's Disciplinary and Ethics Commission provides the following guidelines to help CFP® professionals determine when their activities are considered financial planning or material elements of financial planning.

The primary factors on which CFP Board relies for determining whether "material elements" exist are:

1. The client's understanding and intent in engaging the CFP® professional
2. The degree to which multiple financial planning subject areas are involved
3. The comprehensiveness of data gathering
4. The breadth and depth of recommendations

Activities that CFP Board would likely consider to be material elements of financial planning include:

1. Conducting detailed data-gathering regarding multiple aspects of a client's financial situation
2. Analyzing a client's data and making recommendations across multiple financial planning subject areas
3. Providing investment advisory services as defined by the applicable State or Federal regulators

Activities that CFP Board would not likely consider to be material elements of financial planning include:

1. Opening an account or completing an application
2. Fact-finding to meet regulatory requirements for suitability such as the "Know Your Customer" rules
4. Solely providing brokerage and/or insurance products or services
5. Engaging in activity solely related to the sale of a specific product
6. Acting as a mortgage broker without providing any other financial services
7. Completing tax returns without providing any other financial services
8. Teaching a financial class or continuing education program

The above are examples and should not be considered an all-inclusive list.

These guidelines are designed to be helpful to CFP® professionals in reviewing their activities and determining whether they are providing material elements of financial planning. CFP Board's Disciplinary and Ethics Commission also relies on these guidelines when reviewing allegations of misconduct by CFP® professionals.

Question 1-9: How can CFP® professionals determine when a specific service or activity rises to the level of financial planning?

Under CFP Board's definition of "financial planning," as found in the *Standards*, CFP® professionals are able to determine when they are providing services using the material elements of financial planning by considering, among other things, the degree to which multiple financial planning subject areas are involved. While it is more likely for financial planning to exist when multiple subject areas are involved, in some circumstances a financial planning engagement may exist even when a single subject area is involved.

CFP® professionals should consider whether the client's understanding and intent in engaging the CFP® professional would give the client reason to believe the services provided are financial planning. CFP® professionals should also consider the comprehensiveness of their data gathering with a client and the breadth and depth of their recommendations to a client.

When determining whether a financial planning engagement exists, the entirety of a client relationship should be examined. These questions may guide that determination:

1. Is the CFP® professional involving the steps of the financial planning process in the services provided?
2. How many financial planning subject areas are involved to meet the client's goals?
3. With respect to the services provided, what did the CFP® professional communicate to the client?

Financial planning often does not occur in neat boxes but is a process that progresses and evolves over the course of a financial planner's relationship with a client. For example, answering a question of a specific nature – such as "How much money do I need to set aside each month to send my two-year-old to Notre Dame in sixteen years?" – would probably not be considered financial planning. However, answering a broader question that involves multiple aspects of a client's situation – such as "How much do I need to save so I'll have a secure retirement?" – would likely rise to the level of financial planning because of the expansiveness of the financial considerations involved.

Question 1-10: What should I do if I am unsure whether a specific service or activity rises to the level of financial planning?

The question of whether a client relationship involves financial planning is one that CFP Board determines on a case-by case basis. CFP Board encourages CFP® professionals who are unsure if a particular service or client relationship rises to the level of financial planning to embrace CFP Board's fiduciary standard and provide services in ways they believe are in the best interest of the client.

It is intentional that the terminology section of CFP Board's *Standards* does not define "material elements of financial planning." In financial planning relationships, products, services, solutions and strategies represent a means to an end – meeting life goals through proper management of financial resources.

It would be impossible to provide guidelines for every possible situation related to financial planning, but CFP Board wants to assist CFP® professionals in complying with the *Standards*. To submit a particular situation for CFP Board to consider, or to submit questions about specific aspects of the *Standards* and their application to specific situations, please submit your question to standards@CFPBoard.org.

Question 1-11: What distinctions do the *Standards* make between financial planning services and other services that don't rise to the level of financial planning?

The *Standards* apply to all CFP® professionals, but certain sections of the *Rules of Conduct* set forth additional requirements for CFP® professionals who provide financial planning services to clients. When a CFP® professional provides financial planning or material elements of financial planning, the *Standards* require:

1. A heightened duty of care to the client;
2. Additional disclosures to the client or prospective client, including some that must be made in writing; and
3. A written agreement governing the financial planning services.

The individual Rules related only to client engagements that rise to the level of financial planning or material elements of financial planning are as follows:

Rule 1.4 sets the baseline duty of care CFP® professionals owe at all times to clients: "place the interest of the client ahead of his or her own." That same rule sets forth a heightened duty of care for CFP® professionals who provide to clients financial planning or material elements of financial planning: "the duty of care of a fiduciary as defined by CFP Board." CFP Board's definition of fiduciary is: "One who acts in utmost good faith, in a manner he or she reasonably believes to be in the best interest of the client."

Rule 1.2 describes information that must be disclosed by a CFP® professional to clients and prospective clients if the services to be provided include financial planning or material elements of financial planning.

Rule 2.2 identifies information that must be disclosed by a CFP® professional to all clients and prospective clients, regardless of whether the services to be provided rise to the level of financial planning. When the services do rise to the level of financial planning or material elements of financial planning, section (e) of Rule 2.2 requires that the disclosures be made in writing.

Rule 1.3 requires that if services to be provided include financial planning or material elements of financial planning, the professional (or the professional's employer) shall enter into a written agreement with the client governing the financial planning services.

Question 1-12: Does conducting a needs analysis or suitability review reach the level of financial planning or material elements of financial planning?

There are a wide variety of activities that are labeled "needs analysis," and some of those activities may reach the level of financial planning or material elements of financial planning. If a "needs analysis" is focused on gathering detailed information about multiple aspects of a client's financial situation and analyzing that information in light of the client's stated future goals, or if the analysis is used to make wide-ranging recommendations, that "needs analysis" is considered financial planning.

In contrast, if a "needs analysis" is focused on a limited component of the client's financial situation, and does not involve other services related to financial planning, that analysis may not rise to the level of financial planning. For instance, if a client hires a CFP® professional solely to purchase life insurance, the CFP® professional will by necessity obtain information about the client sufficient to ensure that any policies recommended meet the client's needs. If the "needs analysis" is focused solely on factors related to the client's life insurance needs, that analysis may not rise to the level of financial planning.

A standard suitability review conducted in association with a transaction – a review that takes into consideration such basic elements as the client's age, net worth and risk tolerance – does not typically reach the level of financial planning or material elements of financial planning.

The facts and circumstances of each situation are a key factor in CFP Board's determination of whether a CFP® professional has engaged in financial planning or material elements of financial planning.

Question 1-13: How many elements of the financial planning process can a CFP® professional provide in order for those activities to constitute "material elements of financial planning"?

A CFP® professional who integrates the financial planning process with two or more subject areas will, in most cases, be providing financial planning or material elements of financial planning.

Under the definition of "financial planning," the *Standards* provide guidance CFP® professionals may use to determine whether they are providing financial planning. The factors are:

1. The client's understanding and intent in engaging the CFP® professional

2. The degree to which multiple financial planning subject areas are involved
3. The comprehensiveness of data gathering
4. The breadth and depth of recommendations

The criteria above focus on the integration of the six steps with two or more financial planning subject areas.

As illustrated in [Question 1-2](#), a broker who is a CFP® professional and employs all six steps of the financial planning process to recommend a brokerage transaction only would probably not be considered to be providing financial planning services in view of the fact that a single subject area is involved. However, a CFP® professional could inadvertently provide financial planning services by acting in a way that the client reasonably believes that the CFP® professional is providing financial planning. [See Questions [1-3](#), [1-4](#) and [1-8](#)] To avoid such situations, the *Standards* require a CFP® professional to mutually agree upon the services to be provided with each client. [See Rule 1.1] Although a CFP® professional who is providing services other than financial planning is not required to describe the scope of the engagement in writing, it is recommended as a best practice to do so.

[Question 1-2](#) provides an example of an activity that may be considered to involve material elements of financial planning: conducting detailed data-gathering regarding multiple aspects of a client's financial situation. This activity may rise to the level of material elements of financial planning if the CFP® professional's activities include one or more of the following:

1. Employing multiple financial planning subject areas to analyze a client's financial situation
2. Gathering information about a client's entire financial situation, including goals
3. Recommending a broad financial plan requiring a depth of technical knowledge to execute the plan
4. Mutually defining the scope of the engagement with a client where the client understands and intends to engage the CFP® professional in financial planning

Given the in-depth process used in this example, CFP Board would likely consider the CFP® professional in the above-mentioned activity to be providing financial planning or material elements of financial planning.

Question 1-14: How many financial planning subject areas can a CFP® professional address with a client without reaching the level of "material elements of financial planning"?

Applying the financial planning process to a single subject area is not likely to be considered financial planning or material elements of financial planning. CFP® professionals who integrate the financial planning process and two or more subject areas may be providing financial planning or material elements of financial planning.

Under the definition of "financial planning," the *Standards* note that one of the factors CFP Board considers in determining whether a financial planning relationship exists is the degree to which multiple financial planning subject areas are involved.

When a CFP® professional's recommendations involve multiple subject areas and the CFP® professional integrates those subject areas with the steps of the financial planning process, the CFP® professional may be providing material elements of financial planning. It does not matter if these recommendations occur during one meeting with the client, or over several meetings over a period of time.

It is unacceptable for a CFP® professional to employ one product, service module, or subject area at a time in an attempt to avoid having the client relationship be considered financial planning or material elements of financial planning. [See Questions [1-3](#) and [1-4](#)]

Question 1-15: In situations where a CFP® professional implements financial planning recommendations prepared by a third party, will the CFP® professional's implementation activities be considered financial planning or material elements of financial planning?

The facts and circumstances of each situation are a key factor in CFP Board's determination of whether the CFP® professional has engaged in financial planning or material elements of financial planning. The most significant factor that CFP Board will consider in determining whether activities such as implementation rise to the level of financial planning is the client's understanding and intent in engaging the CFP® professional. If a CFP® professional implements recommendations made by a third party, the degree of specificity in the recommendations is another factor that CFP Board will consider in determining whether the implementation activities constitute financial planning.

If the recommendations are less specific and require the CFP® professional to provide wider-ranging recommendations as part of the implementation process, the CFP® professional's implementation activities may rise to the level of financial planning. This would be the case if, for example, a client's tax advisor recommends additional tax-deferred savings and the CFP® professional

assists the client to determine the type of deferred savings, the amount to be saved, an investment approach and specific investment vehicles. By contrast, if the client limits the engagement with the CFP® professional to implementation activities only, the engagement may not rise to the level of financial planning. This would be the case if, for example, the recommendations set out an investment strategy with specific amounts allocated to specific asset classes and the CFP® professional's actions are limited to executing transactions based on the recommendations identified in the financial plan.

To reduce the possibility of misunderstanding between a CFP® professional and his/her client, CFP Board recommends that all CFP® professionals carefully describe to their clients the services to be provided, particularly where the scope of the engagement is limited. Documenting the scope of the engagement in an agreement or other document can help prevent misunderstanding.

CFP Board encourages CFP® professionals who are unsure whether a particular service or client relationship rises to the level of financial planning to embrace CFP Board's fiduciary standard and provide services in ways they believe are in the best interest of the client.

Question 1-16: Is a CFP® professional who provides financial planning services more likely to be disciplined by CFP Board than a CFP® professional who does not provide financial planning services?

No. The *Standards* apply to all CFP® professionals, regardless of the type of services a professional provides to clients, and only four of the 30 Rules in the *Rules of Conduct* are limited in scope to professionals who provide financial planning services. The *Standards* do require CFP® professionals who provide financial planning services to provide specific written documentation to a client and to provide services with the duty of a fiduciary, as defined by CFP Board, but the *Standards* do not state that violations of Rules limited in scope to financial planning services merit harsher discipline than violations of Rules that relate to services other than financial planning.

CFP Board's *Disciplinary Rules and Procedures* provide CFP® professionals with a fair and expeditious disciplinary process whenever CFP Board discovers information about a professional's potentially unethical conduct. As part of the process, CFP Board provides a fair and objective investigation into each allegation and determines the merits of the allegations based on the evidence provided. The Disciplinary and Ethics Commission (Commission) issues discipline only when the evidence in a specific case substantiates a finding that the *Standards* have been violated.

The events and context of a situation will affect each of the decisions the Commission makes for a particular case. The Commission considers the severity of a violation and any aggravating or mitigating factors when determining what type of discipline should be issued, not whether the violation relates to a Rule limited in scope to financial planning services.

Did this answer your question?

[Yes](#)

[No - I have a specific question not addressed in this FAQ](#)

How can I request an answer to my question?

CFP Board welcomes questions about specific aspects of the *Standards of Professional Conduct* and their application to specific situations.

To submit questions about specific aspects of the *Standards* and their application to specific situations, contact CFP Board at standards@CFPBoard.org.

CFP Board will consider all questions submitted and draft a response where it determines that interpretation of the *Standards* is needed. For responses that it believes would be helpful to all CFP® professionals, CFP Board will publish its response in CFP Board's newsletters and on CFP Board's Web site.

Send your questions and requests for guidance documents to CFP Board at standards@CFPBoard.org.

FIDUCIARY DUTY

Question 2-1: Why doesn't CFP Board just say that all CFP® professionals are fiduciaries?

The *Standards* require that all CFP® professionals who provide financial planning services will be held to the duty of care of a fiduciary, as defined by CFP Board. Since some CFP® professionals are not involved in providing financial planning services to clients, it would be inappropriate to hold these individuals to a duty of care that may not apply to their professional activities. While CFP Board's fiduciary standard is reserved for financial planning services, the *Standards* nevertheless require a high duty of care for all CFP® professionals in any type of client relationship: "A CFP® professional shall at all times place the interest of the client ahead of his or her own." [See Rule 1.4]

Question 2-2: How can a CFP® professional be certain that a recommendation is the "best" for a client, given the enormous variety of financial strategies and products available? Does CFP Board expect CFP® professionals to investigate every conceivable option that might be available to a particular client?

CFP Board's ethical standards have always emphasized the importance of professional judgment. The importance of a CFP® professional's judgment is highlighted in the definition of "fiduciary" in the *Standards*: "One who acts in utmost good faith, in a manner he or she reasonably believes to be in the best interest of the client." CFP Board expects CFP® professionals to provide only financial planning recommendations (services and/or products) that they reasonably believe to be the best possible options available to their clients.

CFP Board acknowledges that it is impossible to review all possible options to select the best. There can be nearly infinite options when one brings together an individual's situation and goals with the ever-increasing range of choices available to the financial services industry. For a CFP® professional who works in a setting where business or regulatory requirements limit the services or investments that can be made available to clients (captive agents, for example), CFP Board expects any financial planning services provided to be the best services and recommendations available, given the CFP® professional's reasonable professional judgment and the limitations placed on the CFP® professional by those business or regulatory requirements. In such situations, the CFP® professional would be expected to disclose the limitations to the client, including any contractual or agency relationships that have potential to affect the client and any terms under which proprietary products may be offered.

For the CFP® professional who is engaged in financial planning or material elements of financial planning, *Practice Standards* 400-2 explains that "the recommendations developed by the practitioner may differ from those of other practitioners or advisers, yet each may reasonably meet the client's goals, needs and priorities." Additionally, *Practice Standards* 500-2 explains that "products and services selected by the practitioner may differ from those of other practitioners or advisers [and m]ore than one product or service may exist that can reasonably meet the client's goals, needs and priorities."

Question 2-3: Is it possible for a CFP® professional to be subject to two different standards of care at the same time under CFP Board *Rules of Conduct*?

No. Rule 1.4 establishes the standard of care required by CFP® professionals. The rule establishes a baseline standard that requires that all CFP® professionals place the interest of the client ahead of their own at all times. When providing financial planning or material elements of financial planning, the CFP® professional's duty of care rises to that of a fiduciary, as defined by CFP Board. A CFP® professional's fiduciary status supersedes the baseline standard of care. [See Rule 1.4]

It should be noted that the current regulatory structure of the financial services industry in the U.S. assigns regulatory oversight to various bodies based on the type of product or service involved, rather than on the type of client relationship within which those products or services are provided. With the differences in the standards imposed by various regulatory bodies, CFP Board requires CFP® professionals to understand how particular regulators or certifying bodies apply standards of care pertinent to the client relationship. Failure to comply with regulatory requirements could subject a CFP® professional to discipline by CFP Board under Rule 4.3.

Did this answer your question?

[Yes](#)

[No - I have a specific question not addressed in this FAQ](#)

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DISCLOSURE & WRITTEN AGREEMENT – FINANCIAL PLANNING

Question 3-1: What disclosures do the *Standards* require for client engagements that do involve financial planning or material elements of financial planning?

CFP® professionals involved in client engagements that do involve financial planning or material elements of financial planning must make all of the disclosures listed in Rule 2.2, and they must also make those disclosures in writing. [See Questions [3-2](#), [3-3](#), [3-4](#), [3-6](#) and [3-7](#)] The written disclosures need not be a single newly-created document; the written disclosures may be made through multiple documents or through existing disclosure documents, such as Form ADV, that are used to make disclosures in compliance with state or federal laws, or the rules or requirements of any applicable self-regulatory organization.

Rule 1.2 outlines additional disclosure obligations to clients or prospective clients for engagements that include financial planning or material elements of financial planning, including the following general areas:

- The obligations and responsibilities of each party
- Any compensation that may be related to the client agreement
- The terms under which proprietary products may be offered
- Any factors that determine costs
- The terms under which other entities will be used to meet any services outlined in the agreement.

Rule 1.2 also notes that if the information above is disclosed in writing, the CFP® professional must encourage the client or prospective client to review the information and offer to answer any questions that the client or prospective client may have.

Question 3-2: When, what and how does CFP Board require disclosure to clients and prospective clients when providing financial planning?

Rules 1.2 and 2.2 of the *Standards* address the timing, content and manner in which disclosures must be made by a CFP® professional to a client or prospective client. If the CFP® professional offers financial planning or material elements of financial planning, the following must be disclosed either orally or in writing prior to entering into a written agreement with a client:

- Contact information for the CFP® professional, and the firm with which the CFP® professional is associated;
- Any information about the CFP® professional or the firm with which the CFP® professional is associated that could materially affect the client's decision to engage the CFP® professional;
- The CFP® professional's and client's obligations and responsibilities under the agreement;
- The compensation that the CFP® professional, the CFP® professional's firm, and/or any third party may earn under the agreement;
- How costs of products and services are determined;
- Whether and how the CFP® professional may benefit from the client's decision;
- If the CFP® professional offers proprietary products and the terms under which such products may be offered;
- Other likely conflicts of interest; and
- Whether the CFP® professional may use other entities to fulfill the obligations of the agreement.

CFP® professionals should note that Rule 4.3 of the *Standards* requires compliance with applicable regulatory requirements governing professional services provided to the client.

Question 3-3: Does CFP Board expect CFP® professionals to hand deliver disclosure documents, or can the documents be posted or delivered on a CFP® professional's or the CFP® professional's employer's Web site?

Rules 1.2 and 2.2 require CFP® professionals to disclose certain information to clients or prospective clients. The Rules allow for any form of delivery to clients. Under Rule 1.2, if the disclosures are made in writing, the CFP® professional must encourage the prospective client or client to review the information and offer to answer any questions from the client or prospective client. CFP Board believes best practice is to disclose such items upon request; before any agreement is signed; or prior to any transaction where the client is expected to pay for a service or product. Notifying the client or prospective client that the disclosure information can be found on an employer's Web site probably does not meet the standard of care required under Rule 1.4, which obligates the CFP® professional to place the client's interest ahead of the CFP® professional's interest.

Question 3-4: When should a CFP® professional send out disclosure documents to clients?

The *Rules of Conduct* do not specify a timeframe for sending out disclosure documents. CFP Board believes a CFP® professional's best practice is to disclose such items when the client requests such information or before any agreement is signed or prior to the execution of any transaction where the client is expected to pay for a service or product. If information previously disclosed to a client changes, Rule 2.2 requires that those changes be disclosed to the client in a timely manner.

CFP Board understands that CFP® professionals may be engaged in providing clients financial services that fall under different regulatory environments. Each regulatory environment may require CFP® professionals and their employers to provide disclosures at different points during a client relationship. CFP Board does not advocate any particular business model or any form of compensation and does not intend to replace the regulatory requirements for disclosing items to clients. CFP® professionals are reminded to adhere to Rule 1.4 when dealing with clients in all capacities.

Question 3-5: In what ways are the disclosures required by the current *Standards* different from the disclosure requirements in the former *Standards*?

The current *Standards* introduce several changes to the disclosure requirements for CFP® professionals:

1. Disclosures Required for Prospective Clients

The current *Standards* expand CFP Board's disclosure requirements by requiring disclosures to be made to prospective clients as well as existing clients, including material information relevant to the CFP® professional's relationship such as compensation and conflicts of interest, as well as information about the CFP® professional's credentials and business affiliations. [See Rules 1.2 and 2.2]

2. Additional Guidance about Disclosing Conflicts and Compensation

The current *Standards* provide additional guidance about the types of conflicts [See Rule 2.2(b)] and the type of compensation disclosure that must be made to clients and prospective clients, including direct and indirect sources of compensation to the CFP® professional and/or the CFP® professional's employer. [See Rule 2.2(a)]

3. Ongoing Disclosure Obligation

While the former *Standards* required CFP® professionals to tell clients on an annual basis that they can request information about compensation and conflicts of interest, the current *Standards* provide a more proactive requirement, stating that the CFP® professional shall make timely disclosure updates to the client if previously-disclosed information becomes outdated. [See Rule 2.2]

Question 3-6: How does a CFP® professional disclose compensation?

CFP Board does not advocate any particular business model or form of compensation. CFP® professionals provide services under various regulatory environments and consequently, may be required to comply with federal and/or state laws, as well as the rules of a self-regulatory organization. The regulatory environment in which a CFP® professional operates governs how the CFP® professional and his/her employer receives compensation and how that compensation must be disclosed to a client. CFP Board's *Standards* do not allow a CFP® professional to avoid the regulatory requirements imposed by federal and/or state authorities, or a self-regulatory organization.

CFP® professionals must provide an accurate and understandable description of the compensation arrangements, including information related to costs and compensation to the CFP® professional and/or the CFP® professional's employer. This disclosure requirement allows the client to make an informed decision. The *Standards* do not require disclosure of specific dollar amounts or percentages of compensation to a client unless the client specifically asks for this information. If the client asks a CFP® professional the amount he/she will earn from a specific transaction or service, the CFP® professional must provide this information, to the extent it can be determined. [See Rule 2.2] If the cost to the client is not known until a series of decisions or actions occur, a CFP® professional must make that information available to the client as it is determined.

Question 3-7: What does CFP Board mean by "costs" and "any other sources of compensation"?

Rule 2.2a.ii requires disclosure of expenses the client will incur, including firm or adviser expenses passed on to the client as an additional charge. Examples that must be disclosed include but are not limited to the following, when applicable:

- 12b-1 fees;
- Cash bonuses or other incentives received from the firm or issuer for selling specific financial or insurance products;
- Trailing commissions for selling financial or insurance products;
- Compensation received from wrap-fee programs;
- Trading fees, if passed on to the client;
- Ticket charges, if passed on to the client;
- Administrative or management fees on mutual funds or variable annuities as outlined in the prospectus; and
- Solicitation fees.

If the cost to the client is not known until a series of decisions or actions occurs, the *Standards* do not require the CFP® professional to provide disclosure until that information is determined.

Question 3-8: Is any additional written documentation required by the *Standards*?

Yes. Rule 1.3 requires that financial planning services be accompanied by a written agreement that identifies:

1. The parties to the agreement;
2. The date of the agreement and its duration;
3. The procedure and terms for terminating the agreement; and
4. A description of the services to be provided as part of the agreement.

This written agreement requirement may be satisfied through multiple documents, and it is CFP Board's belief that most CFP® professionals or their employers currently provide clients with written documents that cover the requirements of Rule 1.3.

The written agreement requirement was designed to help ensure that CFP® professionals and their clients define clearly the services involved in a specific business relationship and help reduce disputes based on misunderstandings of those services.

As with the former *Standards*, the current *Standards* require that CFP® professionals entering a financial planning engagement make specific written disclosures to the client or prospective client. [See Rules 1.2 and 2.2] The disclosures required to be in writing under the current *Standards* do not differ significantly from the written disclosures required by the former *Standards*.

Question 3-9: Will CFP Board provide sample agreements and disclosures that CFP® professionals can use with their clients?

Yes. CFP Board has created sample disclosure forms and a sample agreement form that CFP® professionals may use with their clients.

[Form OPS](#) (Other than Financial Planning Services) and [Form FPD](#) (Financial Planning Disclosure Document) may help CFP® professionals assemble a document containing the information required to be disclosed under Rules 1.2 and 2.2.

Form FPD is for CFP® professionals who provide financial planning services or material elements of financial planning; Form OPS is for CFP® professionals who provide services that do not rise to the level of financial planning.

[Form FPDA](#) (Financial Planning Disclosure Document and Agreement) may help CFP® professionals who provide financial planning services or material elements of financial planning create a document that satisfies the written agreement requirements of Rule 1.3 as well as the disclosure obligations of Rules 1.2 and 2.2.

CFP Board understands that employers of CFP® professionals who provide services other than financial planning may require CFP® professionals to have their clients sign a document or disclaimer stating that the CFP® professional is not providing financial planning services. Regardless of any document or disclaimer signed by a client, CFP Board reserves the right to make an independent determination of whether the CFP® professional's services rise to the level of financial planning based on CFP Board's *Rules of Conduct*. If CFP Board determines that the CFP® professional provided financial planning and the terms required under Rule 1.3 were omitted or a written agreement was not provided, CFP Board may enforce Rule 1.3 against the CFP® professional. Similarly, Rules 1.2 and 2.2 may be enforced if CFP Board determines that the CFP® professional provided financial planning without the written disclosures required by the *Rules of Conduct*.

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[Yes](#)

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DISCLOSURE – NON-FINANCIAL PLANNING

Question 4-1: What disclosures do the *Standards* require for client engagements that do not involve financial planning or material elements of financial planning?

Rule 2.2 sets forth the disclosures required of all CFP® professionals when dealing with clients and prospective clients. These disclosures include the following general areas:

1. Any compensation that may be related to the client engagement;
2. Any conflicts of interest that may affect the client engagement;
3. Any relevant information about the CFP® professional or the CFP® professional's employer; and
4. Contact information for the CFP® professional and, if applicable, the CFP® professional's employer.

The *Standards* also acknowledge that disclosure is not always a one-time event. As a client engagement evolves over time, perhaps with added or re-structured services, ongoing disclosure is also important. Rule 2.2 makes that clear in its concluding statement: "The CFP® professional shall timely disclose to the client any material changes to the above information." Rather than follow a periodic annual or semi-annual schedule for repeated disclosures, this provision of Rule 2.2 requires that disclosures be made on an ongoing basis, allowing a client to make informed decisions based on the most current information.

Question 4-2: When, what and how does CFP Board require disclosure to clients and prospective clients when not providing financial planning?

Rules 1.2 and 2.2 of the *Standards* address the timing, content and manner in which disclosures must be made by a CFP® professional to a client or prospective client. If the CFP® professional does not offer financial planning or material elements of financial planning, the following must be disclosed orally:

- Contact information for the CFP® professional, and the firm with which the CFP® professional is associated;
- Any information about the CFP® professional or the firm with which the CFP® professional is associated that could materially affect the client's decision to engage the CFP® professional;
- The CFP® professional's and client's obligations and responsibilities;
- The compensation that the CFP® professional, the CFP® professional's firm, and/or any third party may earn;
- How costs of products and services are determined;
- Whether and how the CFP® professional may benefit from the client's decision;
- If the CFP® professional offers proprietary products and the terms under which such products may be offered; and
- Other likely conflicts of interest.

Written disclosure is not required; however, it is a recommended practice that CFP® professionals provide disclosures in writing.

CFP® professionals should note that Rule 4.3 of the *Standards* requires compliance with applicable regulatory requirements governing professional services provided to the client.

Question 4-3: Does a CFP® professional who is not providing financial planning or using the financial planning process need to provide clients or prospective clients with written disclosure documents?

No. Rule 2.2 identifies five disclosure items that every CFP® professional must disclose to clients and prospective clients. CFP® professionals, however, are not required to give clients or prospective clients those disclosures in writing unless they are providing financial planning services or material elements of financial planning.

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[Yes](#)

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PRINCIPAL TRADES & PROPRIETARY PRODUCTS

Question 5-1: How do the *Standards* relate to CFP® professionals who provide clients principal-trade transactions?

CFP Board is neutral as to the type of investment or planning strategies a CFP® professional may use to achieve a client's objectives and goals, as long as those strategies comply with CFP Board's *Standards* and with any applicable federal or state regulatory requirements related to the activities they undertake. [See Rule 5.1] CFP® professionals may engage in principal-trade transactions, provided that the CFP® professional is allowed to make principal-trade transactions under applicable federal and state regulations and that the CFP® professional complies with any additional requirements under CFP Board's *Standards* that may or may not be part of the requirements of federal or state regulatory requirements, such as the following:

- Disclose conflicts of interest [See Rule 2.2]
- Assess whether any particular recommendation to purchase or sell financial products is suitable for the client [See Rule 4.5]
- Exercise reasonable and prudent professional judgment [See Rule 4.4]
- Perform professional services with dedication to the lawful objectives of his or her employer and in accordance with the *Standards* [See Rule 5.1]
- Place the interest of the client ahead of his or her own at all times [See Rule 1.4]

If a CFP® professional implements principal-trade transactions as part of a financial planning engagement or the material elements of financial planning, Rules 1.2, 1.3, 1.4 and 2.2 set out additional requirements for written documentation and require that the CFP® professional provide services with the duty of care of a fiduciary, as defined by CFP Board. [See [Question 2-2](#)]

Question 5-2: Do the *Standards* apply to CFP® professionals who recommend or sell proprietary financial products?

Yes, the *Standards* apply to all CFP® professionals, regardless of the type of investment and planning strategies used to achieve a client's objectives and goals. All financial product recommendations made by CFP® professionals, including proprietary financial products, must comply with the requirements of the *Standards*, including the following:

- Assess whether any particular recommendation to purchase or sell financial products is suitable for the client [See Rule 4.5];
- Exercise reasonable and prudent professional judgment [See Rule 4.4];
- Perform professional services with dedication to the lawful objectives of a CFP® professional's employer and in accordance with the *Standards* [See Rule 5.1];
- Comply with applicable regulatory requirements governing professional services provided to clients [See Rule 4.3]; and
- Place the interest of the client ahead of his or her own [See Rule 1.4].

When a CFP® professional recommends the purchase of a proprietary financial product, the CFP® professional must comply with the disclosure requirements contained in the *Standards*, including disclosure of the following information:

- An accurate and understandable description of the compensation arrangements being offered, including:
 - i. Information related to costs and compensation to the CFP® professional and/or the CFP® professional's employer; and
 - ii. Terms under which the CFP® professional and/or the CFP® professional's employer may receive any other sources of compensation, and if so, what the sources of these payments are and on what they are based. [See Rule 2.2(a)]
- A general summary of likely conflicts of interest, which would include, but not be limited to, the fact that the CFP® professional may recommend the proprietary financial products of his or her employer or principal. [See Rule 2.2(b)]
- Any information that could reasonably be expected to materially affect the client's decision to engage the CFP® professional that the client might reasonably want to know in establishing the scope and nature of the relationship, including but not limited to information about the CFP® professional's areas of expertise. [See Rule 2.2(c)]
- Contact information for the CFP® professional and, if applicable, the CFP® professional's area of expertise. [See Rule 2.2(d)]

If the transaction in a proprietary financial product is part of a financial planning engagement, CFP Board requires the services provided to be the best services and recommendations available, given the CFP® professional's reasonable professional judgment

and any limitations placed on the CFP® professional by any particular business framework or regulatory requirement. In such situations, the CFP® professional must disclose the limitations to the client in writing, including any contractual or agency relationships that have the potential to affect the client and any terms under which proprietary products may be offered. [See Questions [2-2](#) and [5-1](#); see also Rule 1.2]

These guidelines apply to all CFP® professionals who are providing financial planning services to a client or prospective client. It is of no consequence that the CFP® professional is an employee or an agent of a firm, or whether the firm allows transactions in the firm's proprietary financial products as one option for clients, or requires its proprietary products to be offered to all clients.

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[Yes](#)

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FEDERAL & STATE REGULATIONS

Question 6-1: How do the *Standards* relate to federal and state statutes, rules, regulations and case law with respect to the obligations of a CFP® professional?

The *Standards* require a CFP® professional to be in compliance with applicable regulatory requirements governing professional services provided to the client. [See Rule 4.3] The *Standards* apply to all CFP® professionals regardless of the licenses, certifications or registrations each holds. Thus, the *Standards* are only binding upon the CFP® professional and are not intended to alter or define currently existing federal, state or self-regulatory requirements. As such, the *Standards* clearly provide that CFP Board's ethical standards "are not designed to be a basis for legal liability to any third party." [See Introduction to *Rules of Conduct* and *Financial Planning Practice Standards*] CFP Board has authority only over the individuals to whom it has granted CFP® certification; CFP Board does not certify broker-dealers, investment advisory firms, mutual fund companies, hedge funds or other entities, and those entities are therefore not required to abide by CFP Board's *Standards*.

Question 6-2: Why doesn't CFP Board use the same definitions used by federal and state regulators and courts for important terms such as "financial planning" and "fiduciary"?

No single definition of either "financial planning" or "fiduciary" has wide acceptance among either regulators, firms or professionals. CFP Board felt it important to establish definitions appropriate for CFP® professionals in a manner that would be understood by CFP® professionals and the clients they serve. The terminology used in CFP Board's *Standards* was crafted to be relevant to the activities of those who hold CFP® certification and to facilitate CFP Board's enforcement of its *Standards*.

Question 6-3: Will the *Standards* be applied differently for CFP® professionals with different licenses or registrations (such as registered representatives, investment adviser representatives, insurance agents)?

No. The *Standards* apply to all CFP® professionals, regardless of the licenses or registrations each holds, and regardless of the specific business or compensation structure each uses.

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Yes

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HOLDING OUT

Question 7-1: Do the *Standards* apply to those who hold CFP® certification but who do not display the CFP® marks or hold themselves out as financial planners?

Yes. The current *Standards*, as did the former *Standards*, require a baseline duty of care for all client relationships that involve an individual who holds CFP® certification. When CFP Board applies its *Standards* to an individual who holds CFP® certification, CFP Board's focus is on the conduct of the CFP® professional, not only the titles used to describe the CFP® professional's roles or services. A CFP® professional is obligated to abide by CFP Board's the *Standards*, irrespective of whether the CFP® marks appear on the CFP® professional's business cards or stationery. Removal of the CFP® marks from one's business cards or stationery does not relieve a CFP® professional of the obligation to follow the *Standards*.

CFP® professionals have, on occasion, been asked by their companies to remove the CFP® marks from their business cards and promotional materials. Some such requests have been made based on misunderstandings of CFP Board's *Standards* and their application. CFP Board encourages CFP® professionals in similar situations to notify CFP Board and to request that their company representatives contact CFP Board.

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TEAM ARRANGEMENTS

Question 8-1: How do the *Standards* relate to CFP® professionals who provide services as part of a team arrangement?

CFP Board's application of the *Standards* to a CFP® professional who functions as a member of a team focuses primarily on the functions performed by the individual. This includes a determination of the contributions the CFP® professional makes to services the team provides to a client. That determination includes evaluating the overall services the team provides to a client as context for the CFP® professional's contributions.

A team situation involves a number of variables that affect the context in which the CFP® professional contributes to a team's services to a client. When determining whether a CFP® professional on a team has provided financial planning services, the following factors may be applicable:

1. The client's understanding and intent in engaging the team, the CFP® professional's contributions to the team and the CFP® professional's role with the client;
2. The degree to which the CFP® professional's contributions to the team involved multiple financial planning subject areas;
3. The comprehensiveness of the data gathering the CFP® professional conducted as part of the team's services to the client; and
4. The breadth and depth of any recommendations the CFP® professional contributed to the team's services to the client.

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TERMINATING THE ENGAGEMENT

Question 9-1: Is it possible for a client of a CFP® professional to terminate the financial planning engagement with the CFP® professional and still receive other services from the CFP® professional?

It depends on whether a CFP® professional is providing the future services and the nature of those services. In general, once a financial planning relationship with a CFP® professional has been established, all future services provided by the CFP® professional to the client are likely to be considered by CFP Board to be part of the financial planning process. It is important for CFP® professionals and clients to work together to develop a mutual understanding of the scope of the engagement. One important factor CFP Board will consider when determining whether activities are material elements of financial planning is the client's understanding and intent in engaging the CFP® professional. For example, a client can enter into a written agreement with the CFP® professional to limit the financial planning engagement to the first four steps of the financial planning process, i.e., the engagement ends with the CFP® professional's recommendations. Whether subsequent interactions with the client constitute financial planning will depend on whether such services fall within CFP Board's definition of financial planning or material elements of financial planning. The facts and circumstances of each situation are factors in CFP Board's determination of whether the CFP® professional engaged in financial planning or the material elements of financial planning.

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FIRM OBLIGATIONS

Question 10-1: Are firms required to ensure that their employees and representatives who hold the CFP® certification adhere to CFP Board's ethical standards?

No. CFP Board certifies individuals, not firms. As a condition of CFP® certification, CFP® professionals are required to abide by CFP Board's *Standards*. While firms themselves are not required to abide by the *Standards*, many have undertaken efforts to assist the CFP® professionals they employ, or with whom they are affiliated, to comply with their responsibilities as CFP® professionals. The *Standards* specifically note that a CFP® professional will be considered in compliance with the *Standards* if the CFP® professional's employer has completed the required actions on his or her behalf. [See Introduction to the *Standards*]

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LIABILITY

Question 11-1: Do the *Standards* increase liability for CFP® professionals?

Liability in the financial services business exists regardless of whether one's services can be considered financial planning. CFP Board believes that compliance with the *Standards*, including the requirement that financial planning services be provided with the duty of a fiduciary, is a way to reduce liability.

The *Standards* were developed to be an enforceable set of requirements that CFP Board can apply to those who hold CFP® certification; they are not meant to be used for third party liability. [See Introduction to the *Standards*] CFP Board nevertheless understands that claimants may attempt to introduce aspects of CFP Board's *Standards* in litigation and arbitration proceedings. Just as it would be inappropriate for CFP Board to interpret or enforce rules established by FINRA, the SEC or state regulators, it would be inappropriate for other bodies to interpret or enforce CFP Board's rules. When CFP Board is made aware of attempts by other bodies to enforce CFP Board's rules against a CFP® professional, CFP Board can provide the CFP® professional with documentation that explains CFP Board's jurisdiction over its own rules and affirming that the rules are not meant to create liability to anyone other than CFP Board. Situations like these have occurred in the past with CFP Board's previous *Standards*, but CFP Board does not have information showing that any court or arbitration panel has in fact made findings of violations of CFP Board rules.

Consumers seek advice they can trust. They deserve disclosure, competence, professionalism and ethics. Those elements are an integral part of the *Standards*. CFP Board believes liability is reduced when CFP® professionals and their clients have a clear and mutual understanding of their relationship and the services within that relationship. The *Standards* include rules designed to enhance that mutual understanding.

CFP Board encourages the public to seek out the services of CFP® professionals from the wide variety of choices they have among financial service providers precisely because CFP® professionals are held to high standards of competence, professionalism and ethics. We are confident that firms and CFP® professionals can and will embrace and develop practices that comply with the *Standards*. It is the right thing to do for the consumer.

Did this answer your question?

Yes

No - I have a specific question not addressed in this FAQ

How can I request an answer to my question?

CFP Board welcomes questions about specific aspects of the *Standards of Professional Conduct* and their application to specific situations.

To submit questions about specific aspects of the *Standards* and their application to specific situations, contact CFP Board at standards@CFPBoard.org.

CFP Board will consider all questions submitted and draft a response where it determines that interpretation of the *Standards* is needed. For responses that it believes would be helpful to all CFP® professionals, CFP Board will publish its response in CFP Board's newsletters and on CFP Board's Web site.

Send your questions and requests for guidance documents to CFP Board at standards@CFPBoard.org.

WHY REVISE THE *STANDARDS*?

Question 12-1: Why did CFP Board revise the ethical standards for CFP® professionals?

CFP Board continually updates its standards and procedures, and the current *Standards*, which includes the *Code of Ethics and Professional Responsibility*, *Rules of Conduct*, *Financial Planning Practice Standards* and *Candidate Fitness Standards*, reflect the most recent of such initiatives.

- The first *Code of Ethics* was introduced in 1985, and revisions were made in 1988, including the introduction of the first *Disciplinary Rules and Procedures*.
- The next major revision, in 1993, established the Principles and Rules of the *Code of Ethics*.
- The Board of Practice Standards began work on the *Practice Standards* in 1995 and the *Practice Standards* were first published in 1999.
- The *Practice Standards* were finalized in 2002, and in 2003 the 400 series in the Rules was revised.
- The *Candidate Fitness Standards* were introduced in 2006 and took effect in 2007.
- The latest revision of the *Code of Ethics*, *Rules of Conduct* and *Practice Standards* began in 2005, and the updated *Standards* took effect July 1, 2008, with an enforcement date of January 1, 2009.

CFP Board's governing Board has responsibility for ensuring that the ethical standards for CFP® certification remain strong, enforceable and appropriate for the current regulatory and business environment. When CFP Board's ethical standards were first introduced, the very concept of financial planning as a profession was newly formulated. The business and regulatory environment that existed then was very different than the current environment.

Question 12-2: Are the current *Standards* stronger than the former *Standards*?

Yes. While many standards were left unchanged, the following key existing standards have been strengthened:

- The baseline duty of care for those holding CFP® certification has been raised from the former "reasonable and prudent professional judgment" standard to a requirement that a CFP® professional "shall at all times place the interest of the client ahead of his or her own." [See Rule 1.4]
- For CFP® professionals providing financial planning services, the duty of care has been raised from the former duty to "act in the interest of the client" to the current "duty of care of a fiduciary," which is partly defined as acting "in the best interest of the client." [See Rule 1.4 and Terminology]
- Requirements for disclosures to clients and prospective clients, and requirements for documentation of the relationship with a client have also been strengthened. The *Standards* also clarify that the disclosure requirements for CFP® professionals apply to clients as well as prospective clients. [See Rules 1.2 and 2.2]

These latest revisions are intended to maintain CFP Board's high ethical standards, strengthen them in several important ways, and present the *Standards* in a manner that will be easily understood by CFP® professionals and the public they serve.

Did this answer your question?

Yes

No - I have a specific question not addressed in this FAQ

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