

**COMMENTS ON CFP BOARD'S PROPOSED CHANGES TO FITNESS STANDARDS, PROCEDURAL RULES AND SANCTION GUIDELINES**

CFP Board invited public comments on proposed changes to its Fitness Standards, Procedural Rules and Sanctions Guidelines. The comment period ran from March 31, 2026 through April 30, 2026. The comments received are posted below.

**Please comment on your level of support or opposition to the proposed change:**

***Modify the confidentiality provision so that CFP Board may disclose Confidential Information about an ethics investigation to a CFP® professional's firm (except for Confidential Information concerning a client who is not a client of the CFP® professional's firm).***

	<b>First name</b>	<b>Last name (c/o firm name, if applicable)</b>	<b>Response</b>
1	Devon	Henry	If the information is shared with the firm prior to the conclusion of an investigation it opens up the CFP Board up to liability should the party being investigated be retaliated against by their employer - specifically, if the party investigated is found to be innocent.
2	Jason	Brownstein	The CFP board should not be doing any communication with the firm in regards to a internal investigation to the board keep in mind if the board chooses to sanction a CFP professional that's one thing, but if they contact the employer, it could ruin that person's employment versus just having CFP sanctions. Firms do not have the same type of review processes and ethical obligations as a board and therefore, if they receive any negative documentation, they will likely just result to a termination without even hearing out the case. This to me should not even be a discussion and as a CFP professional, I feel worried about this rule and feel it could be a liability to my employment. Should the board ever investigate me for something rather than just a liability to my designation?
3	Daniel	Eisenberg	Given the crossover, I would assume if there was an ethic probe on one side there would be one on my bank's side, but I think each investigation should be discrete - that way if it does come to light there was an ethics violation one side can't taint another. Sometimes there could be a judgement call and I would want it to stay a judgement call for each side not either being pressured either way (innocent or guilty)
4	Wendy	Dudley	It is important for transparency.
5	Robert	Mosson	No on the new changes. Also, no new increase in Fee's.
6	Anna	strohsahl	This shifts CFP Board from a standards body into something closer to an employer surveillance mechanism. It risks: Premature reputational damage before findings are established Chilling effect on due process Firms using "investigations" (not violations) as grounds for termination or leverage There's a clean line here: Findings → disclose Investigations → keep confidential Blurring

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

	First name	Last name (c/o firm name, if applicable)	Response
			that line invites abuse—and frankly, firms already have plenty of power without needing early-warning alerts.
7	Jordan	Banning	While I believe a firm should have knowledge on matters related to the professionals who operate under their firm and their clients. I believe that this has the potential to unfairly cause permanent damage to a professional with an unsubstantiated claim. This also further opens the door to abuse of the complaint process, as they can be submitted anonymously.
8	Edi	Alvarez	While investigated, we should never share the information. Once found guilty then yes it should be shared
9	Ben	Feldmeyer	Compliance will need to know about any complaints - so transparency seems logical.
10	James	Gonzales	Our world today translates "under investigation" as an admittance of crime. A "social conviction" has the power to ruin someone's career and possibly their lives. A trial by social media, depending on the matter, can permanently ruin an individual or firm's reputation.
11	Michael	Rodriguez	Just because someone is under investigation, does not mean they are guilty; however, an employer may decide to consider the investigation in and of itself as reasonable cause to terminate someone and/or could cause some undue friction between the firm and the CFP who is under investigation.
12	Kenneth	Keith	N/A
13	kellon	lawrence	Similar to all of the CFP Board's proposed amendments, this does nothing but punish the professional. Finish the investigation, and if appropriate, by all means contact the firm and make sure appropriate action is taken. Sets a guilty until proven innocent standard that could cause unknown harm to the professional.
14	Arnie	Pechler	I believe information should be withheld until an investigation is completed
15	Colin	McCallum	It seems to me that an investigation is just that, and not a verdict or conclusion. I would be concerned that based on necessary due diligence on behalf of CFP® Board, it could result in a negative outcome for the candidate. All while trying to only improve their own acumen and better serve their clients and firm. Of course, I'm assuming that the candidate has already been forthcoming with all disclosures to their firm before the CFP® Board is ever involved.
16	Matt	Goren	Are there cases in which a CFP pro must disclose an act to CFP Board but not their firm? I would expect all of effectively all of the acts that would need to be reported to CFP Board would also need to be disclosed to the firm. Otherwise, the CFP pro would be in violation of the standard that defines duties owed to the firm.
17	Nathan	Sabattini	I think it would make sense to notify the professional's firm, due to the professional being a representative of that firm as well. They

\*Comments are verbatim, not edited for grammar or spelling.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

	First name	Last name (c/o firm name, if applicable)	Response
			should be aware of any potential ethics concerns regarding mentioned individual.
18	Charles	Schilleci	None
19	David	Henning	This wouldn't impact me either way, but I think it would be fair to those who it would impact their standing at their firm if the investigation ran its full course.
20	KYLE	HELLER	I don't believe this is the role of the CFP mission, and should be focusing efforts on education and qualifications for being a CFP.
21	Henry	deVries	If the ethics investigation pertains to fraud or criminal conduct, limited information should be provided to the firm.
22	Anthony	Atrasz	To me, the CFP marks are individual. I see no reason to disclose information about a firm where actions didn't involve a certificant.
23	Amanda	Burgess	If I'm understanding the question correctly, yes, share that an investigation is occurring. Maintaining the "innocent until proven guilty" mindset.
24	Hatim	Smouni	Some firms may use this as a reason to terminate employment even if the investigation is not finished.
25	Bret	Schultz	More transparency and accountability.
26	Jennifer	Stipick	A firm's knowledge will let the public know how they stand on key issues regarding ethics of their employees.
27	William	Irving	The firm should be made aware of any instance in which a registrant of their firm is under investigation for wrongdoing that may affect their clients at the time of the investigation or in the future.
28	Raquel	Wheeler	Any person representing the CFP Board with the CFP marks in my opinion must act in accordance of their ethics attestation and in essence waive the right to withhold information from their firm/employer if they are under investigation.
29	Matt	Parenti	CFP Board should not share information about its investigation until the findings are complete. Implications prior to judgement could negatively affect the employees standing before that employee was even found to have done anything wrong. After any investigation, it would be OK to disclose.
30	William	Inman	If modified, it should be able to disclose outcomes of investigations not simply that an investigation is present or ongoing.
31	Christopher	Luna	In an era of political turmoil, lawfare, and the weaponization of federal investigative branches for the purpose of quieting dissent, I believe we have a duty to ensure that frivolous accusations and retaliatory investigations do not hinder a person's ability to work. Americans have a first amendment right to speak out against their government and should not be subject to investigation or criminal charges for doing so. I do not believe an employer should be informed about any pending matter, as allegations have not yet been proven. Allowing the reporting of an inconclusive investigation enables coercion through the threat of investigation and weakens

\*Comments are verbatim, not edited for grammar or spelling.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

	First name	Last name (c/o firm name, if applicable)	Response
			the CFP board's ability to ensure accuracy and promote accountability.
32	Elliott	Pollak	I believe this requirement will make the CFP designation more valuable to clients and is not a difficult standard for CFP Professionals to follow.
33	Brianna	Smith	As a business owner, I would want to know. But as a human being, I would hate for someone to face backlash from an unwarranted investigation. CFP professionals have a duty to the client and to uphold Board standards regardless of the firm they work for. If someone is found to have violated CFP Board standards, but the issue does not involve illegal conduct or anything that violates SEC rules, their job should not be put at risk simply because an investigation occurred. However, if what they are found guilty of is illegal or violates SEC standards, then people should be informed and appropriately warned. At the same time, if the person is ultimately found innocent, their reputation should not be damaged by prematurely alerting their employer about alleged misconduct that did not occur, especially since many employers may suspend or terminate an employee before the facts are confirmed.
34	Tyler	Caveness	For standard investigations into professional conduct violations, in my opinion notification should not be provided to the professional's firm until the investigation is complete and a violation is officially determined. Providing notice of an ongoing, unverified investigation could lead to premature disciplinary action or reputational damage within the firm before the CFP® professional has had a fair opportunity to defend themselves. Maintaining the confidentiality provision until an investigation is closed in my opinion maintains a balance between firm oversight and the professional's right to due process.
35	Rachel	Dippel	I generally agree with the proposed change, as transparency and timely communication with a CFP® professional's firm can enhance client protection and strengthen oversight. Firms are ultimately responsible for supervising their representatives, and having awareness of an active investigation allows them to take appropriate risk management steps. That said, I believe it is important to balance transparency with fairness to the professional. Disclosure should be limited, clearly defined, and implemented in a way that avoids reputational harm prior to a final determination. Safeguards should be in place to ensure that information shared is relevant, necessary, and does not compromise due process. Overall, I support the intent of the proposal, provided that appropriate boundaries and protections are maintained.
36	Maria	Pauley	The high standards differentiate the CFP® certification from other certifications. Revising these standards such that it results in "lowering the volume of Fitness Petitions to a manageable level and enabling the DEC to focus on matters that involve more

\*Comments are verbatim, not edited for grammar or spelling.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

	First name	Last name (c/o firm name, if applicable)	Response
			egregious conduct" is concerning because it appears to propose changes to manage workload volume, rather than upholding the high standards, diminishing the reputation of the CFP® certification.
37	George	Allen	Great idea, but there should probably be some additional detail about who at the firm receives the notice about the investigation and limit it to leadership or compliance officers.
38	Douglas	Frank	I understand the CFP Board's desire to protect its brand by being selective about who may be eligible to obtain the rights to use the CFP marks or who may continue to do so. However, it seems that the board is drifting towards operating as a regulatory body in the guise of protecting its brand. The CFP Board seems to be seeking a broader role in investigating and publicly discrediting those Financial Advisors within CFP Board's orbit that the board views disapprovingly. There are already regulatory bodies performing those functions with the aim of protecting the public. Obtaining the CFP designation is purely elective and a great many ethical and successful Financial Advisors function effectively without the CFP designation. In my view, the CFP Board should focus more of its attention on making the brand increasingly more desirable to those advisors and focus less on taking on the role of punishing those applicants or CFP designees who don't meet the CFP Board's standards.
39	Eric	Faurote	I don't understand why the CFP board would need to disclose information about a member to the members firm without the members knowledge or consent.
40	Melissa	Brennan	I believe confidentiality should be maintained until there is an outcome. If there is a board investigation, it is unlikely that the firm won't know about it also. Most firms require that client complaints be disclosed.
41	Stuart	Wells	The proposed changes allowing CFP Board to provide updates to firms regarding investigations raise important considerations. While firms may have a legitimate interest in such information, CFP Board should carefully balance that interest against: the risk of reputational harm prior to adjudication; the potential for misuse of such information in employment disputes; and the need to preserve fairness where allegations are contested. Additional guidance or limitations may be appropriate to ensure that such communications do not unintentionally influence ongoing disputes or create undue prejudice.
42	Michael	Basile	The question should be limited to "Within the last 10 years, have you been....." I'm a firm believer in giving humans a second chance in life.....especially if they have the dedication to do what it takes to attain their CFP designation.
43	Cindy	Graham	This information is pertinent and should be disclosed the CFP® professional's firm as a way to further uphold the CFP® highest standards with being communicative to the firm about an ethics

\*Comments are verbatim, not edited for grammar or spelling.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

	<b>First name</b>	<b>Last name (c/o firm name, if applicable)</b>	<b>Response</b>
			investigation--I do believe the individual should also be notified the CFP Board will be disclosing this information.
44	Gerald	Wick	This disclosure is very important to the industry. The recommendation brings out ' honesty ' to the CFP professional and integrity to the association we are apart of.
45	Sara	Cortes	CFP Board must always evaluate how it balances the fact that it's relationship is with the individual certificant, but that the certificant's practice is inextricably tied to any firm they work for. This change strikes an appropriate balance. Most of the time, certifiants are agents of their firm. and the "client" is actually a client to the firm. This measure will help firms fulfill their ultimate fiduciary responsibility to clients. It will also ultimately help certifiants because it can help coordination of materials needed for the investigation.

**COMMENTS ON CFP BOARD'S PROPOSED CHANGES TO FITNESS STANDARDS, PROCEDURAL RULES AND SANCTION GUIDELINES**

CFP Board invited public comments on proposed changes to its Fitness Standards, Procedural Rules and Sanctions Guidelines. The comment period ran from March 31, 2026 through April 30, 2026. The comments received are posted below.

**Please comment on your level of support or opposition to the proposed change:**

***Modify the Fitness Standards so that a candidate with such a misdemeanor conviction has to file a Petition only when CFP Board's Enforcement Counsel seeks public notice or a temporary or permanent bar prohibiting the candidate from applying for CFP® certification.***

	<b>First name</b>	<b>Last name (c/o firm name, if applicable)</b>	<b>Response</b>
46	Jason	Brownstein	I see this proposed change as a way to reduce workload on the CFP boards petition committee. I think that anybody that has these convictions should be required to petition for fitness. We should be making it harder for professional professionals to obtain the CFP designation. It should not be easier because it will dilute the quality of the brand and while I believe that this is a issue that the CFP board cannot be fiduciary on due to the revenue from the board coming strictly from new CFP professionals so the board is incentivized heavily to bring on more CFP professionals to collect annual dues. I think that the CFP board should be focused on elevating the brand and profession of the CFP and financial planning rather than spending money on marketing and trying to get more CFP professionals in the door and starting to pay annual due d
47	Wendy	Dudley	No further comment.
48	Robert	Mosson	no, And no on any increase in fee's.
49	Anthony	Sconzo	I feel this is ok as long as the candidate has disclosed all misdemeanor convictions.
50	Anna	strohsahl	This is a more proportionate approach. Requiring a full Petition for lower-level misdemeanor issues—especially when most result in private cautions anyway—creates unnecessary friction without improving outcomes. It slows down candidates, burdens the system, and doesn't meaningfully enhance investor protection. Shifting the formal Petition process to cases where: public disclosure, or a bar to certification is actually on the table makes the process more efficient and focused. That said, the key risk here is consistency. If Enforcement Counsel has more discretion, there needs to be: clear internal standards documented rationale oversight to avoid uneven application Done right, this streamlines the process without lowering standards. Done poorly, it creates subjectivity.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

	First name	Last name (c/o firm name, if applicable)	Response
51	Jordan	Banning	The proposed change means CFP Board Staff can handle the straightforward, low-risk cases with a private written admonishment and move on, while the DEC's time and attention gets reserved for cases where the public actually has a stake in the outcome - meaning situations serious enough to warrant public notice or a potential bar from certification. From a resource allocation standpoint, it makes a lot of sense. If the DEC is spending hearing time on a candidate with a 10-year-old DUI second offense who has an otherwise spotless record, that's time and energy not spent on a case involving actual financial misconduct or a pattern of dishonesty - the kinds of things that directly threaten clients.
52	Edi	Alvarez	Anyone with a CFP standard MUST NOT have any convictions ... making it easier for anyone who violates any CFP Rules is NOT how we hold ourselves to a higher standard. We must hold everyone to the highest standard despite the effort that it requires from the CFP ... private anything is like a pardon and dependent on the whim of whoever is in charge of the final decision. I do not think anyone should be granted an easier path since misdemeanors in our system are already a compromise to something a professional should never have done.
53	Michael	Rodriguez	This seems fair.
54	Kenneth	Keith	N/A
55	kellon	lawrence	While I am sure there are some misdemeanors that point towards a professional not acting in an ethical manner, this just seems like overreach.
56	Colton	Maher	Upholding the ethical values of the CFP should be paramount.
57	Matt	Goren	The current process is too time consuming and does not serve the public, the Board, the volunteers, or the certificants. This is a good simplification. That said, I strongly believe the Board should return to the prior standard that set time limits on certain activities. E.g., more than 10 years ago. An unrelated misdemeanor from 10+ years ago should not affect a candidate's fitness, so it should not need to be disclosed.
58	Charles	Schilleci	None
59	David	Henning	I might agree or strongly agree, but I would like to know what the list of misdemeanor convictions are on both sides of the need for the petition.
60	KYLE	HELLER	I'd prefer the CFP board not worry with these standards and simply follow what other regulatory bodies do for these types of issues. Why does the CFP board feel they need these additional standards?
61	Anthony	Atrasz	I need an example of what you are talking about. This can be too broad of a category. From DUIs to disorderly conduct. It would need to be serious misdemeanors that are contra to the publics best interest. I would vote for specific list.

\*Comments are verbatim, not edited for grammar or spelling.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

	First name	Last name (c/o firm name, if applicable)	Response
62	Adam	Kaufman	Itai Bronshtein has a DUI, a felony, a stalking conviction, and a harassing communications charge. This guy should be banned from finance and accounting.
63	Bret	Schultz	Let's uphold the strong integrity of the mark.
64	William	Irving	It makes sense that this could be a time intensive process that would lend itself to a need for revision. I have some trepidation that reducing the Fitness Petition requirement could result in a lowering of the standards for certificants of the profession.
65	Christopher	Luna	Political tensions are high and this results is a higher number of arrests and convictions for activities that are constitutionally protected. Arrests for protesting may not necessarily reflect that a protected activity was involved. These charges can include obstruction, resisting arrest, trespassing, disorderly conduct, or potentially even more egregiously miscategorized offenses. I believe it is the CFP board's duty to protect the public from fraud and misrepresentation; It is not the responsibility of the CFP board to ensure that no licensee has a criminal record. I support efforts to reduce the number of unnecessary fitness petitions for misdemeanor offenses that are unlikely to have any bearing on a licensee's professional conduct.
66	Tyler	Caveness	In my opinion there should be a periodic audit of the CFP Board Enforcement staff-issued admonishments to ensure they align with the standards the DEC would have applied.
67	Rachel	Dippel	I generally agree with the proposed change, as it appears to improve efficiency by allowing CFP Board to focus its formal Petition for Fitness process on cases that are more likely to result in public sanctions. Streamlining the process for less severe or dated misconduct may reduce unnecessary administrative burden while still maintaining accountability through private admonishments. However, I believe it is important to ensure consistency and transparency in how these determinations are made. Providing clear guidance on when a Petition is required versus when a private resolution is appropriate would help maintain fairness and confidence in the process. Overall, I support the intent of the proposal, provided that appropriate standards and safeguards are in place to ensure equitable treatment of all candidates.
68	Maria	Pauley	The high standards differentiate the CFP® certification from other certifications. Revising these standards such that it results in a shift "to focus on candidates with prior misconduct that are more likely to result in public notice" is concerning because it appears to propose changes to manage workload volume, rather than upholding the high standards, diminishing the reputation of the CFP® certification.
69	Douglas	Frank	The decision to approve or disapprove of a candidate's request for CFP certification should remain between the CFP Board and the applicant. Either the candidate is fit or the candidate is not. Declaring a rejection and the reason for that rejection publicly is

\*Comments are verbatim, not edited for grammar or spelling.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

	First name	Last name (c/o firm name, if applicable)	Response
			unnecessary. The Board should seek to draw people to the designation. Not create fears that have the potential to push worried candidates away from pursuing CFP certification.
70	Melissa	Brennan	I don't fully understand this proposal. Is this sentence referencing the misconduct or the candidate? "CFP Board proposes for the Petition process to focus on candidates with prior misconduct that are more likely to result in public notice". What does this mean? "CFP Board Enforcement staff in other situations to issue private written admonishments without the extensive Petition process to candidates with prior misconduct that require lesser scrutiny." What is Enforcement staff? What other situations? What situations qualify for lesser scrutiny?
71	Stuart	Wells	Reducing the need for a full Petition process in lower-risk cases may benefit both candidates and CFP Board by streamlining the certification process and conserving resources. However, this increased reliance on Enforcement Counsel discretion also raises important considerations regarding consistency, transparency, and procedural fairness. In particular, CFP Board may wish to consider: whether clear standards or guidelines should be articulated to govern when a Petition is required versus when a private admonishment is appropriate; whether candidates should have the opportunity to request a formal hearing in circumstances where they believe a private determination does not fully or accurately reflect the facts; and whether additional safeguards are needed to ensure that discretionary decisions are not influenced by incomplete records or uncorroborated allegations. These considerations are especially relevant in situations where the underlying conduct arises in the context of ongoing disputes or where the factual record is contested. With appropriate safeguards in place, the proposed change could improve efficiency while maintaining the fairness and integrity of the certification process.
72	MANDO	DIBARTOLOMEO	I strongly agree with the proposed change to focus the Petition for Fitness process on candidates whose prior conduct is more likely to result in a public sanction. Under the current framework adopted in 2024, candidates with isolated, remote misdemeanor histories are routinely required to undergo a formal Petition process even when the outcome is predictably a private caution or no public action. This creates significant delay and burden without a corresponding benefit to public protection. By way of illustration, I completed the CFP Board education requirements, passed the CFP® examination, and filed a Petition based on a misdemeanor disclosure from more than 17 years ago that predated my entry into the financial services profession by approximately a decade. Despite the age and limited relevance of the conduct, the Petition process has extended for several months. This experience reflects a broader structural issue. Requiring full Petition proceedings for

\*Comments are verbatim, not edited for grammar or spelling.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

	<b>First name</b>	<b>Last name (c/o firm name, if applicable)</b>	<b>Response</b>
			cases unlikely to warrant public notice consumes significant candidate and disciplinary resources that could be better directed toward more serious matters. Allowing lower-risk cases to be resolved through private written admonishment appropriately aligns procedural scrutiny with public risk and promotes efficiency, fairness, and public trust.
73	Michael	Basile	Only misdemeanor convictions within the last 10 years should qualify for a hearing.
74	Cindy	Graham	Yes, I completely agree with this proposed change as it should be implemented immediately. As stated, there is a high standard to uphold with being a CFP® professional and striving to maintain good moral character should be a top priority.
75	Gerald	Wick	Agreed with proposal
76	Sara	Cortes	Giving enforcement staff the discretion to determine whether the conduct leading to a misdemeanor conviction merits a Petition will allow the DEC to focus on Petitions that raise more serious and unique issues, thereby better upholding the meaning behind the CFP(r) marks.
77	Foster	Hyde	I believe that anyone with these certain misdemeanor conviction should have to submit a petition. We should not be making our designation easier to access unless each of these is investigated.

**COMMENTS ON CFP BOARD'S PROPOSED CHANGES TO FITNESS STANDARDS, PROCEDURAL RULES AND SANCTION GUIDELINES**

CFP Board invited public comments on proposed changes to its Fitness Standards, Procedural Rules and Sanctions Guidelines. The comment period ran from March 31, 2026 through April 30, 2026. The comments received are posted below.

**Please comment on your level of support or opposition to the proposed change:**

***Modify the Procedural Rules so that if both Enforcement Counsel and the applicant agree to the public notice, then instead of having the Disciplinary and Ethics Commission (DEC) (the peer review body that makes ethics determinations) conduct a hearing on the Fitness Petition, Enforcement Counsel should have discretion to file, and Counsel for the DEC (the lawyer who assists the peer review body) should have the authority to grant, a joint motion with the applicant for an Order granting the Petition with a Public Notice.***

	<b>First name</b>	<b>Last name (c/o firm name, if applicable)</b>	<b>Response</b>
78	Jason	Brownstein	I disagree with this proposed change. I believe that everything should go through a peer review and there should be zero discretion on the body to issue a pass or Stock order. I think that the candidate should always be able to petition and a lot of the times the candidate might not know what's best for them and might not feel they are able to make their case.
79	Wendy	Dudley	None
80	Anna	strohsahl	This is a pragmatic change that reflects how these cases are already playing out in reality. If: Enforcement Counsel has determined the outcome, the applicant agrees, and the result is a known endpoint (approval + public notice), then requiring a full DEC hearing becomes more procedural theater than meaningful review. Streamlining this: reduces time and cost for candidates frees up DEC resources for contested or higher-risk cases maintains transparency through the public notice The only caveat is governance: There should be clear guardrails and documentation around when this path is used, to ensure consistency and avoid the perception of "quiet dealmaking." Handled properly, this is just cutting out unnecessary middle steps—not lowering standards.
81	Jordan	Banning	This step provides credible authority and oversight to the decision. Where the peer review body effectively presents the recommendation, but the DEC still weighs their own discretion in their decision. Without the DEC, it leaves the decision on the peer review body more vulnerable to scrutiny in those decisions, as well as potential risk to bias or disparate treatment.
82	Edi	Alvarez	wish your question was not so full of jargon and legal language ... it would make it MUCH easier to be sure that my answer is what I

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

	First name	Last name (c/o firm name, if applicable)	Response
			want ... I DO NOT THINK that ANYONE with a prior history of relevant misdemeanor should EVER be allowed to carry the CFP certification and if you have decided to allow these criminals into a profession that requires self regulation then you must put in place the strictest rules to ensure someone finds out ... few people know to check even public notices! You should be making this process as painful and as public as possible.
83	Kenneth	Keith	N/A
84	kellon	lawrence	Again, there might be elements in this that seem appropriate, but this is overreach. What kind of violence? Domestic or a man hitting a women, well punish. A professional gets into a fist fight in a bar? What does the CFP have to do with that? Multiple DUIs certainly don't reflect well on the professional, but he/she might be an amazing planner despite their after work activity.
85	Colton	Maher	The candidate should still have to go through the Fitness Petition process.
86	Matt	Goren	This provides the certificant an opportunity to expedite the process. This is a good thing. As I mentioned in my previous comment, an even greater simplification would be to exclude certain activities if that occurred more than, say, 10 years ago.
87	Charles	Schilleci	None
88	David	Henning	It looks like a less thorough process being proposed. Maybe I'm reading this proposed change incorrectly.
89	KYLE	HELLER	Can we simply follow the same guidelines as a securities licensed professional needs to follow or what FINRA/SEC do? Why does the CFP need to be higher or harder? If the CFP board continues to feel the need to have such overbearing requirements for who can hold the CFP designation make it simple so we do not need to continue to increase fees to cover the costs of lawyers, redoing codes of conducts, surveys. If you have a criminal record post age 25 you simply cannot hold the designation. Sorry, I strongly feel this needs to be simple and not this if this than that scenarios structure.
90	Anthony	Atrasz	I think this depends on how far back you are going. I believe people should get second chances and putting a disclosure for something that happened 20 years ago sounds overreaching. I can certainly say I'm not the same person I was 20 years ago or even 10. Having this will hurt someones career. In stead of all this just make the exam more difficult.
91	Adam	Kaufman	Once a crook always a crook, the applicant should be banned. Anthony Tobin has a felony and should be banned from financial planning. Eyal Dulin also has a felony for wire fraud and should be banned from financial planning
92	Amanda	Burgess	I don't understand the question.

\*Comments are verbatim, not edited for grammar or spelling.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

	First name	Last name (c/o firm name, if applicable)	Response
93	Daniel	Turnwald	I would like to apply since I've had my CLU and LUTCF in the past. Why is it so difficult to carry these over?
94	Bobby	S	Just stop changing stuff so often. It's a waste of resources. Make the test more difficult like it used to be. It's losing prestige. I understand this is a bit of a money grab by more people passing, but let them get those other letters out there and keep this more difficult. Cfp is not what it used to be.
95	Bret	Schultz	Maintain transparency but reduce bureaucracy.
96	Jennifer	Stipick	Keeps things from being too subjective
97	William	Irving	There are a lot of words in your description that muddy the waters to what this change means. If you are saying candidates who have misdemeanor criminal offenses for violence, alcohol and/or drug-related offenses that occurred during their past, should be offered another chance, I say yes. Fraud, theft, misrepresentation (depending on circumstance), and crimes of moral turpitude, I say no.
98	Winston	Booth (Bancroft Booth)	Don't love it. Embezzling from clients and college kid alcohol issues aren't the same.
99	William	Inman	I am think the CFP board should focus more on competence of cfps and less on regulatory and legal process and disclosure to build trust.
100	Christopher	Luna	I believe it is in the best interest of the public to streamline the application process and ensure that an adequate number of licensed professionals are available to assist with rapidly growing demand for financial planning services.
101	Brianna	Smith	It sounds like these issues are being taken less seriously than they should be. Someone with a history of fraud, even if it was a misdemeanor, should be reviewed very closely and likely should not be trusted to serve the public in a fiduciary capacity. There should be more safeguards to prevent individuals with that type of background from becoming CFP professionals, not fewer. One bad actor can damage the credibility and reputation of all CFPs, so this deserves much greater scrutiny.
102	Rachel	Dippel	I generally agree with the proposed change, as allowing a joint motion when both Enforcement Counsel and the applicant agree to a public notice can improve efficiency and reduce the need for formal hearings in cases where the outcome is not in dispute. This approach may help streamline the process while still maintaining transparency through public disclosure. However, I believe it is important to preserve appropriate oversight and ensure consistency in how these determinations are applied. Clear criteria and documentation standards should be established to confirm that waiving a hearing is appropriate and that outcomes remain fair and consistent across similar cases.

\*Comments are verbatim, not edited for grammar or spelling.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

	First name	Last name (c/o firm name, if applicable)	Response
			Overall, I support the proposal provided that sufficient safeguards are in place to maintain the integrity and credibility of the disciplinary process.
103	Stuart	Wells	Allowing a joint motion process in appropriate circumstances may reduce unnecessary proceedings and conserve resources for both CFP Board and applicants. However, because this proposed change removes the involvement of the Disciplinary and Ethics Commission (DEC), which serves as an independent peer review body, CFP Board should ensure that adequate safeguards are in place to preserve fairness and confidence in the process. In particular, CFP Board may wish to consider: ensuring that applicants are fully informed of the implications of agreeing to a public notice, including any reputational or professional consequences; providing applicants with a clear and meaningful opportunity to decline a joint resolution and proceed to a full hearing before the DEC without prejudice; establishing standards or guidance to ensure consistency in when joint motions are appropriate; and preserving the DEC's ability to review or reject joint motions in circumstances where additional scrutiny may be warranted. These considerations are especially important in situations where the underlying facts are disputed, where the applicant may face external pressures, or where the record is incomplete. With appropriate safeguards, the proposed change could improve efficiency while maintaining the integrity, independence, and fairness of CFP Board's disciplinary process.
104	MANDO	DIBARTOLOMEO	Allowing agreed-upon Fitness Petitions to be resolved by joint motion enables matters with no factual dispute to move forward efficiently without unnecessary procedural delay.
105	Michael	Basile	I whole heartedly disagree with this change. Many with "a second alcohol and/or drug-related offense" end up in a 12 Step program in which the foundation of the entire program is anonymity. And again, any offenses over 10 years ago should not be considered in any of the CFP Board's scrutiny.
106	Sara	Cortes	Yes, as with the prior proposed change, I support measures like this that allow the DEC to focus on cases that raise serious ethical issues
107	Foster	Hyde	I don't understand what is being done here. This appears to have been written by an attorney and does not make sense...