

**COMMENTS ON CFP BOARD'S PROPOSED CHANGES TO THE COMPETENCY STANDARDS**

CFP Board invited public comments on its proposed *Competency Standards for CFP® Certification*. The comment period ran from December 17, 2024 through March 3, 2025. The comments received are posted below.

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

***Modify the Standard Pathway to require experience that addresses at least three of the seven steps of the financial planning process.***

First name	Last name (c/o firm name, if applicable)	Response
Hamid	Abdollahi	My ethnic identity is Middle Eastern. I've consistently encountered difficulty finding someone in our industry who can provide constructive criticism and help me improve my work. My efforts are often dismissed, and I'm instead assigned to clients with limited investable income. This pattern has persisted throughout my 20-year banking career. However, I decided to pursue financial advising and planning, and began working towards my licenses and CFP certification. Our industry often leaves individuals like me to either struggle or leave, but my passion for the industry and helping people compelled me to persevere
Brian	Acker	I'm not sure if this language makes experience more important or less important. It's not specific.
Jessica	Adams	I have no issues with this. New CPAs are having to choose a specialty in one of the four required tests to prove specific competency. This isn't abnormal.
Lucas	Adams	CFP coursework is certainly needed, especially for people new to the industry but experience is often a far better teacher and this work requires hands-on experience in the field. It is important to note that not all candidates are client-facing and the Board will need to keep the definition of experience wide enough to encompass the many varied ways people work in this industry.
Patrick	Adams	Watering down the designation
Robyn	Adams	This would be a difficult change to substantiate with candidates. The review and verification process would be difficult to administer if the need to verify specific experience illustrating which steps a candidate had experience with. While it is a good idea, the implementation would be unwieldy.
Charles	Adi	This seems appropriate in principle. However, I would be curious to see the impact of this change in real time. Specifically, what professional experience historically accepted that will no longer accepted under the new rules?
Dennis	Adler	I dont understand the change. For me to answer the question you need to contrast this to the previous requirement
John	Aguilera	Certificants should possess extensive experience in insurance, investments, and other areas of financial planning.
Aaron	Ahlstrom	Makes sense
Frank	Akridge	depends on which three

# CFP BOARD

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Yara	Alberto	often employers don't provide opportunities to unexperienced professionals so attaining experience in at least three of the seven steps would be timely and challenging.
Nicholas	Alcorn	I find this very reasonable - could prevent insurance sales professionals from using CFP immediately (nothing against selling insurance, it just doesn't make you a financial planner in my opinion).
Austin	Allen	Seems more blurry that today's standards.
Caleb	Allen	I agree with the proposed changes here. It might be worth comparing to the CPA certification process in this area which requires a minimum amount of time, relevant areas of practice, and a supervising CPA signoff.
George	Allen	Many young professionals may not be in a position to complete even 3 of these steps during their early years, either as an intern or a professional. However, their experience still opens them up to the world of financial planning and allows for them to ask questions and learn through their experience. Essentially, they can obtain great mentorship without having completed some of these steps.
Mitchell	Allen	Seems appropriate
Edi	Alvarez	More substance ... why not at least 6 out of 7?
Christopher	Amenita	I would even be ok including more than at least three. Competently understanding the planning process should be an expectation.
Ramzan	Amiri	The experience in three financial planning process appears adequate.
James	Anderson	I believe that not having the experience would be an issue. In addition, the last time I checked only knowing 3 out of seven on anything is failing.
Anonymous	Anonymous	Experience is important... so what are you going to do with the ads that CFP is a lounge on the coach profession for college grads?
Bill	Aquila	This seems like a dilution of what it means to be a CFP. If required experience is now only in 3 of the 7 steps, how is that contributing to the demonstration that the applicant would be able to provide unsupervised financial planning? What about the other 4 steps? Do they just get to say, 'Oh, I don't cover that'?? If this is the direction the board is headed, perhaps coming up with a junior version of the CFP would make more sense, while reserving the full CFP certificate for fully qualified individuals.
Jaycob	Arbogast	I am unclear whether this is adding more requirements or removing them. As I currently understand it, someone working towards the 6,000 hours would need to be doing work that covers any 1 of the 7 step process. So if this proposal is increasing the requirement that their work must cover at least 3 of the 7 steps instead of just 1 out of 7 then I support this. I'm always conscious of the argument that 'Now that I have a CFP am I trying to make it harder for others? Am I pulling the ladder up behind me?' but I do believe that the CFP should be difficult to obtain. I think the letters should represent that you are prepared to be a financial planner. That you could run an independent RIA if you wanted to.
Stephen	Archer	This is watering down the high standards.

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Brenda	Armstrong	I think this keeps our designation at a high standard, from the client perspective, to ensure a level of experience is assumed.
Laura	Armstrong	It should be left more general so that folks just starting in the industry can start at one firm and migrate to financial planning after getting their CFP certification.
Christopher	Arnold	It is not too much to ask that potential CFP professionals have experience in at least three of the seven steps of the financial planning process. In fact, it seems quite reasonable and appropriate.
John	Atwater	How many steps are currently required? More required steps are better than fewer
Alison	Bach	Strongly oppose to the extent that this is a lowering of standards. I believe that I had to have 3 years of experience under a CFP and be proficient in ALL steps of the financial planning process. It appears to be a lowering of standards, given that the current standard wants us to 'demonstrates to the public the CFP® professional's ability to provide unsupervised financial planning.' With only having experience with 3 of the 7 steps, I'm not sure how the proposed change is consistent with the current standard.
Raymond	Backers	Increasing the experience will help increase competency. A better verification method should be implemented.
Jim	Bagnato	In my years of preparing to join the financial advisory industry I have been surprised by the general lack of knowledge displayed by many that were closer to CFP certification than I am. All because they happened to work in a very narrow capacity for a firm that 'qualifies' to count experience hours. All of the hours I have achieved as an industry outsider have been connected with rigorous and thoughtful experience construction.
Colleen	Baird	To be 'in the seat' and work with people regularly as a series 7 licensed person is meaningful because you understand better the 'why' behind all the 7 steps. You become wiser and more beneficial to the people you serve by digging deeper.
Nicholas	Bakker	Candidates should be required to have experience that addresses more than just 3 of the 7 steps of the financial planning process.
Dave	Balakrishnan	Applied experience is preferred than just counting employment in the financial services industry.
Michael	Baldwin	We need to make sure that CFP® professionals have the highest professional standards and are able work through more than 'some' portion of the financial planning process. I think that all seven might be a bit too much. But I don't think it is unreasonable to make it four or five parts
Jasmine	Ball	I just don't believe this extra restriction is necessary
Kristin	Balon	It seems it will be difficult to quantify the quality of experience within the 3 steps to get enough of a sense of experience.
Edward	Band	if individual has already garnered certain experience no need to repeat
Darryl	Banks	I believe the intention of this change is good for ensuring candidates are duly qualified as CFP professionals, but question how would this be monitored/enforced (apart from the candidates statement of completion).
Rick	Baray	I agree that experience should be directly related to work as a financial planner

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Andrew	Barfoot	Personally, I believe the experience requirement should address all seven steps. Three is a good start, but all seven seems better.
Christopher	Barker	im not sure what you are suggesting here. I feel like on paper it sounds like the proposed change makes it harder but the question is unclear. I went with oppose because it sounds like it is making things easier to become a CFP but if I am wrong there I would change it to no opinion
Lloyd	Barnhardt	Again, this step simply waters down the application pool. We are Certified Financial Planners and use all seven steps of the financial planning progress regularly. I would keep the highest standards possible.
Edward	Barrett	Should be able to provide all 5-7 steps of the financial planning process
Meg	Bartelt	Yes, please. I think people have be able to get experience hours for ridiculously low-bar activities up until now. For example, writing about an aspect of financial planning is helpful in many ways (and I believe has previously gotten people experience hours), but I don't think it remotely prepares you to ACT as a financial planner.
Andrea	Bartlett	I would caution modifying to only three of the seven. I may make sense to require not less than four of the seven.
Tejuana	Baskerville (National Association of Personal Financial Advisors)	Assuming this means that the experience requirement of 1.) 6,000 hours of professional service related to the financial planning process or 2.) 4,000 hours of apprenticeship experience is still in place, it seems reasonable that experience in at least three of the seven steps of the financial planning process could be achieved in that amount of time, and perhaps even four or five, so that the candidate has a deeper understanding of more than 50% of the process rather than a more limited exposure. HT
Craig	Baum	The current rule is fine and does not need to be changed.
Thomas	Baysinger	Experience in at least one area and the education requirement should demonstrate that they have experience to get marks. Many jobs are one area focused, so this could make it difficult for an applicant to stay with the same employer and get certified. This may lead to lower employee retention.
Chad	Bearden	The 3 year experience requirement is too little. CFP is supposed to be an advanced course and the CFFP considers experienced professionals as those with greater than 5 years. Seems like there is a conflict there, so doing anything to ensure certain experiences are obtained is great.
Geoff	Beck	If CFP professionals do not need to demonstrate experience in ALL areas of financial planning, it severely devalues the certification for those of us that do have experience in all areas of financial planning. The CFP certification is the only one that indicates a specialty in all areas of planning, by reducing it to three we will have specialists (particularly in insurance or tax) that can easily claim they have experience in three of the seven pillars.
Leslie	Beck	I feel the Board is getting too 'into the weeds' by continuing to refine these standards. And what if they did some of those steps some of the time? It's just splitting hairs, and adds to confusion and expense!

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Thomas	Begley	I agree with this proposed change. It provides for CFP candidates to be more holistic in their experience before they are certified.
Phil	Behnen (Centennial Advisors LLC)	Helps improve advisor knowledge
Kaylee	Beier	Depending on someone's role, it may be hard to justify experience in three steps of the process. Having the requirement to have experience in three steps may limit the accessibility of the designation for a team member who doesn't meet with the client. If one doesn't meet with the client it can be hard to fulfill multiple steps.
John	Bell	It's too easy to qualify with just having 'some professional experience'.
Jason	Bely	I agree with this proposed change however WHAT ARE THE THREE STEPS that are selected from the seven steps of the financial planning process? I understand that the intent is to demonstrate financial planning competence to the public but if I'm being frank, the certification has been commoditized to the point that a newly minted CFP with the minimum 3 years of experience is only capable of basic planning. Is there opportunity to explore different levels of mastery of financial planning, and for the CFP board to manage this opportunity?
Chet	Bennetts	The proposed requirement for candidates to demonstrate experience in at least three steps of the financial planning process adds much-needed specificity to the current standard, which could enhance competency by clarifying expectations. However, under the current standard, it is arguably implied that candidates must gain experience across all seven steps of the process. While this broader expectation ensures a more comprehensive exposure, it may also be inconsistently applied or unattainable for individuals in certain roles. Introducing a minimum of three steps addresses this ambiguity but could unintentionally limit pathways for candidates in specialized or non-traditional roles who may excel in a narrower scope of the planning process. It is important to weigh whether this adjustment strikes the right balance between ensuring depth in key areas and maintaining flexibility for diverse professional backgrounds. Additional guidance or alternative pathways might be warranted to preserve inclusivity while upholding competency standards.
David	Benning	I think experience is important. However, I can appreciate that there are certain circumstances where such a simple metric may not make sense.
Brandy	Benton	I believe the profession requires experience in most of the seven steps, not just three. In order to demonstrate the CFP® professional's ability to provide unsupervised planning, it should be supervised for a period of time.
Robert	Beswick	Appears Fine, but how is the board monitoring this?
Kimberly	Bilbrey	I agree that there should be a more defined requirement for experience, but 3 of 7 steps seems low.
Joseph	Billerman	Three years of any experience in financial services is significant. While this change would undoubtedly raise the bar and require a more holistic, relevant experience in or to earn the CFP marks, combined with the ethics, exam, and education requirements, this change would unfairly raise the bar for many financial service

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		professionals that aren't client-facing or that have more specific job assignments. Raising the bar to two instead of three elements might strike a better balance between competency and access.
Matthew	Blair	There are a variety of positions in the financial advice industry that do not necessarily provide experience that would lend itself to unsupervised planning. More direct experience makes more sense compared to two years of potentially broader experience. I'm not sure how this will be enforced outside of personal attestation of the candidate.
Kathryn	Blake	I'm of two minds on this issue; I believe that requiring 3 of 7 steps would make it harder for those in sales roles who do little to no financial planning, to make the switch, which is good. On the other hand, it means that career-changers have a harder time breaking into the field. I've read too many stories in the Forum of career-changers who want to make a difference having a very difficult time obtaining the needed experience. One way to reduce this burden is to approve the Amplified Planning Externship, Core, the FPA Residency and other programs like these for satisfying 3 of 7 steps of the FP process, since they do so now (this would be the only way I support this proposal).
Steven	Blandino	I found no issue with this change.
Brianna	Blount	If there are seven steps to the financial planning process, then the experience in financial planning should reflect all seven steps.
Peter	Bobolia	Candidates should have experience in at least 5 of the 7 areas. Why diminish or cheapen the level of expertise required to hold the CFP marks? It is challenging, and rightfully so.
Nick	Bodnar	No comment.
James	Boles	This is in align with what a CFP professional will be doing, and it's helpful to have a few steps that the CFP applicant's experience covers.
Cindy	Bollinger	CFP licenses should not be issued to persons not actively involved in the rendering of complete client advise. otherwise many people will get the credential just to add to their credibility and put on a business card
Keith	Bonner	The certificant should have experience in all 7 steps. Anything less is again diluting the CFP.
Becky	Boston	We want to make sure that those with the CFP® designation have, at least, a foundation of understanding, otherwise it could erode the legitimacy of the designation.
Douglas	Bouck	Raising the caliber for displaying the Marks is a good move.
Stacy	Bouwman	I strongly support this as there are many who use the designation yet they may only sell insurance products. In my opinion this does not fulfill the fiduciary role.
Matt	Bowen	CFP's should have detailed experience within the field to meet our requirements.
Christopher	Bowman	I have no issues with this.
Scott	Bown	The CFP has always stressed the significance of its planning process. Why would you want to water down the initial experience in this? Also, what happens in another 3 years - will the board lower requirements again?

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Phillip	Bracey	I think that for an advisor three of seven is inadequate exposure to whole process of advisory/planning.
Murphy	Bradshaw	I think the financial planning process is the framework of the CFP designation and the more experience we could require around it the better.
Cindy	Bragdon	I am in strong support of this standard being changed as proposed.
Nathan	Bragg	Experience should be relevant to the certification and this will implement more planning within the industry.
Jason	Branch	I believe that this change is necessary since some jobs don't cover all steps.
Tina	Brannan	The current requirement is very broad. There are many job activities that a person could claim fulfill the current requirement. But many of those would not satisfy the spirit of this rule.
Alexa	Brascetta	I think it should be four of the seven steps as it promotes actually mentoring in the industry.
Melissa	Brennan	Which 3?
Sarah	Brice	As an experienced Insurance Agent, and Current Financial Advisor who has been working specifically to increase my education and commitment towards Clients Best Interest; I encourage broadening the scope of our experience standards relevant to the CFP. I feel it has always been my duty to serve clients in a holistic way for their best interests above my own and my experience, though not entirely Full Financial Planning, should be eligible to be counted. There are countless Planners in our field whose relevant Experience and expertise is much broader than current standards and is potentially overlooked.
Shawn	Brickler	Applicants may or may not be acquiring the CFP designation to specifically engage in 'financial planning'....They may be in a niche role within a particular subset of financial planning. Requiring some professional experience in a certain number of 'steps' in the financial planning process would prohibit a professionals ability to focus on their specialty to some degree. The acquisition of the CFP designation in and of itself, educates the applicant as to the 7 steps of the financial planning process within it's field of study....Also, to require initial certificants to have experience in 3 of the 7 steps, in order to attempt the acquiring of the CFP designation, eliminates otherwise qualified applicants who possess the qualities, aptitude and intellect from other fields of study or experience that add to a CFP's overall competency in our field.
Corey	Bright	It leaves out a lot of other programs including the Externship by amplified planning.
Sterling	Brightman	I have no problems with this recommendation
Nancy	Briguglio (Brightworks Wealth Management)	Experience needs to be relevant.
Matt	Britton	A CFP should have experience in the full process before being able to call themselves a Certified Financial Planner

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Jack	Brod	You have close to the highest possible standard with the ethics (i.e. fiduciary at all times), However, even with this change, you have close to the lowest possible standard for experience. You're making a false promise to the public by stating a newly-minted CFP professional is competent when they only experience one of the principal knowledge topics and three of the seven steps in the process. You appear to have been captured by the big firms and are putting their interests ahead of the interests of building a true profession. A true profession would never allow for this ridiculously low standard for experience. Too little and way too late.
Emily	Brown	In my role, I have indirect exposure to the majority of the 7 steps to the financial process, and I discuss these concepts in my work. However, I do not speak with clients on these 7 steps, so the type of 'experience' required needs to be well defined.
James	Brown	I am not certain this is necessary.
Kyle	Brown	I believe the standard pathway should require exposure to all 7 steps of the financial planning process, but requiring exposure to 3 steps is better than requiring exposure to only 1 step. How can we argue that a person with exposure to only 1 of the 7 steps of financial planning is qualified to give financial advice to clients?
Timothy	Bryant	Adding more regulation for the sake of having more fences, requirements and rules the Board can busy themselves with enforceable action, without a stated reason for a need, is not a good idea.
Lanny	Buchwald	As a retired CFP--No opinion on this proposal
Christine	Buckley	Three is not even half of the planning steps. 5 out of 7 or all seven. Why diminish the standard?
Natalie	Bullen	This may create even more barrier to entry with younger candidates or people of color whose work experience may not closely align with 3 of the 7 stages of financial planning.
Nicholas	Bunio	I kind of understand this but at the same time, if someone wants to work as a CFP, but their experience isn't actually doing all 7 steps of the planning processes, then they aren't getting the full experience of the planning process! It should be 7 out of 7, not 3 out of 7.
Emily	Bushong	experience requirements are good and having a variety of experience will only enhance the credibility of the CFP designation
John	Butcher	This one is fine. CFP should be entry level, so you shouldn't necessarily have to have a ton here.
Cassidy	Butler	I think it is a great idea!
Jeff	Butterfield	As long as there is a clear path to demonstrate a candidate has experience in three of the seven steps.
Alan	Caldwell	The experience should reflect the work with do with clients. Three of the seven is not onerous.
Christopher	Cameron	Relevant experience should be necessary
Edward	Camp	The more someone can demonstrate competency, the more sense it makes.



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Chad	Campbell	To be competent, it seems important to at least have some experience in all areas before being unsupervised. It seems to uphold the standard.
Alex	Canellopoulos	This may need some clarification. What happens to people that have earned the CFP designation by demonstrating 'some professional experience in the personal financial planning process?' Will they need to have 'experience that addresses at least three of the seven steps of the financial planning process' going forward? If they don't have this experience will they lose their marks?
Michael	Carillo	I believe the experience pathway now is too lenient, and know of several individuals who obtained the designation using experience at a position that is very much unrelated to the planning process
Letizia	Carlito	I strongly agree that certificants obtain experience in at least three of the seven steps of the financial planning process. Simply said, experience is where we gain most of our knowledge... and 3 of 7 steps is a very attainable goal.
Sabrina	Carlson	This seems to strengthen the standards to be more comprehensive.
Donnie	Carpenter	Some jobs specifically require staff to stay to only one or two steps of the process, this proposed change makes it harder for young talent to find gainful employment that also moves them toward their goal of being a CFP professional. Ideally they would all be able to work for firms that allow working across the full spectrum of the process, but that isn't realistic and many have to gain experience before being able to work for firms that will provide more full service.
Gordon	Carpenter	all seven steps should be included, otherwise you are not doing business with a CFP
Michael	Carretta	Standard Pathway should require experience in all 7 of the steps of the Financial Planning Process.
Charlie	Carroll	As our population grows making sure all of us protect the brand CFP organization has helped create in the marketplace.
Anthony	Carter	I strongly support this proposal
Steven	Cass	I feel this would provide a pathway for younger CFP certificants.
Ruth Auer	Chady	Would like to see experience in all 7 steps.
Alex	Chan	I think it would prepare future CFPs better
Teresa	Chapin	Who defines that experience? Does it have to be current? I practiced my CPA and CFP 20+ years ago but have maintained my certifications as I plan to use at my next job.
Melody	Chartier	For those that abided the current standard, the new change serves to water down the credibility of the CFP mark in the future. I would like those who consider my CFP designation important to know that I had personal experience in the financial planning industry and was not subject to a lesser, modified pathway.
Jeffrey	Chesner	By putting a number, ( 3 out of 7), gives the requirement more credibility.
Susan	Chesney	Certificants should be able to choose topics that will enhance their knowledge and learning. Requiring certain topics forces them to (likely - since this knowledge was needed to initial certify) review education they already have. If a certificant feels they need to increase in this area, then they should have the option to

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		choose it. More importantly, those that DON'T need, shouldn't be forced to waste time and money and instead allocate those resources to further learning.
Jonathan	Childs	I think having experience with at least three of the seven steps would help the candidate better grasp the application and importance of the other four steps. It is a good start.
Sean	Clancy	Does this add to the experience or take away? Is this saying you need 2 years in 3 of the 7, and if you only have 1 of the 7 for 2 years you don't qualify?
Daniel	Clark	Nothing beats actual experience in the career.
Jamie	Clark	Yes. The Standard pathway is currently very broad and folks can become CFP® professionals without ever working with actual financial planning clients.
Steven	Clark	I think it makes sense to require experience in a minimum number of steps of the financial planning process.
Daniel	Clay	I believe it is important to have experience to understand the process in a real scenario before acquiring the CFP designation
Daniel	Clothier	While I see how this may benefit the industry, I believe those currently in the standard pathway must be afforded the ability to complete the requirements as laid out when started. I would support the measure for those beginning the pathway after a set date.
Ed	Coambs (Healthy Love and Money)	I am unaware of the reality that people do not have to show experience with all seven steps of the financial planning process, and I think it is prudent that we hold students to the highest standard. If we want competent and capable professionals, why not have them show experience and exposure to all seven steps of the financial planning process?
Monique Rene	Coates	I only oppose this because there are some people, like myself, who have no professional planning experience and NEED some help to get going. I have an MBA in International Business. However, if attaining CFP certification REQUIRES experience of ANY amount, how does anyone get any, in advance, in order to qualify for the certification / certificate? Almost impossible. Thank you.
Lisa	Cochran	I think if the idea of being immediately capable of providing services to clients upon obtaining the designation is the goal, then having the experience in 3 areas would be justified.
Eric	Coffman	This additional requirement protects against candidates using watered-down experience, as an intern for example, to fulfill the experience qualification.
Chris	Cohan	I support this requirement as it shows a commitment to growing your knowledge and experience in the industry
Erna	Colborn	I believe broad experience is needed before certification.
Akil	Cole	Three out of Seven areas is not a hindrance. If they are certified, at least three areas is reasonable.
Carter	Cole	I strongly support this because as a legal professional that works in fiduciary litigation, but does not participate in individual financial planning it is almost impossible for me to satisfy the current experience requirement without changing jobs. Thus, not being able to get the certification that would significantly boost my career prospects.

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Audra	Collett	I am not in favor of lowering the standards of obtaining the certification. CFP represents a high credential that is focused on the 7 steps of the financial planning process. It is necessary to have that experience in all areas to properly advise clients.
Frank	Collins	Our profession requires more than text book work. It requires interactivity with the client. I agree that we should include the experience requirement.
Patricia	Conrad	I am ok if you want to make it more specific, but I do not necessarily think that you have to. If they have planning experience, they would most likely already have achieved three of the seven steps.
Daniel	Conroy	I believe individuals with more relevant work experience will prove to be better CFP candidates. I found myself drawing on a lot of personal experiences with clients to relate practice exam questions to real life scenarios. I also believe this will also lend more credence to the CFP marks indicating an experienced financial professional.
Alyson	Coran	I like that it assigns a specific number - it is measurable
John	Corrigan	The seven steps are likely to evolve in the future - does this create complexity that is challenging to evaluate?
David	Corry	Clients today are demanding more from the industry. I believe this is a needed upgrade.
Luke	Costa	I think this is a good addition to help ensure a broad knowledge is being applied to financial planning rather than say just insurance planning.
Beverly	Cox	not sure about the difference between 'some' professional experience and having experience in at least 3 of 7 steps...does person get to choose which 3 steps? i think current definition implies they have some experience in all 7 steps.
Stephen	Craft	One value of the CFP certification is the comprehensive financial planning process that underlies the certification. By specifying a minimum number of steps for the professional experience, I am concerned that you will actively discourage professional with a concentrated focus (i.e., investment advising) to learn the CFP process. Stated another way, I want an investment professional to understand their practice in context. This requirement change will likely serve to discourage professional with a focused practice from being exposed to the entire process. The effect will be precisely counter to what the change would seem to be intended to achieve.
Jessica	Crow	I honestly would like to see the level of experience required increased.
Tracy	Crowley	I feel lowering the standard of work experience reduces the credibility of those holding it. Understanding the process is not the same as applying it and learning with client relationships over time. I think 3 years is barely enough.
Jason	Croy	Quantifying the experience required will remove ambiguity.
Jose	Cuevas	I hired a pastor who launched his ministry and provided financial counseling to his congregation, as needed. Would the rule change affect this? If it did, I would be against it because he's managed finances for a business and given advice to help with debt management, saving and ideas on investing. Gray areas should receive discretion.

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Daniel	Cunningham	Some candidates, especially self starters, may not have access to practice the financial planning process supervised at their current job or firm
Rachel	Currington	I strongly believe one of the best indicators of a well-rounded financial advisor is their experience in financial planning.
Eric	Curry	Requiring experience that addresses at least three of the seven steps improves the quality of the certification by more directly tying the experience requirement to financial planning.
Michael	Curry	I support the change but I think we should expand on this to make the proposed change more specific in its wording.
Michael	Custer	I'd say they can take the CFP exam right away if they want but probably wise to have some years of experience to begin practicing. However, if they have their Series exams & CFP then they would most likely have 5 years in by then. Maybe that's enough?
Michael	Daley	Anything that can be done to align the experience requirement with the financial planning process and provide broader exposure to create more well-rounded and competent professionals is a good idea.
Nicholas	Dally	With the CFP certification being a multi-disciplinary certification, I do feel that it is prudent that a certificant have experience that represents that.
Vincent	Damiani	While more narrow experience requirements are not necessarily bad, it may be difficult for some to achieve early in their careers. We do not want young people to bypass the field in similar to fashion to what we are seeing in accounting at present time.
Emily	Dannemiller	At first review this could be challenging to identify and could hinder career development. If i am required to have the designation prior to advancing to a position that engages in planning, and I cannot get the designation until i have experience in the position, what options exist?
Craig	Darnell	I believe a CFP designees should be able to demonstrate that they have experience in all 7 steps of the financial planning process.
Galan	Daukas	Na
Brandon	Davies	The bachelor's degree requirement should be removed in favour of more relevant / practical experience required.
Susan	Davies	I think it's imperative that candidates are experienced and not right out of college
Dennis	Davis	What issues have been discovered with current requirement? I have never heard of any in CFP pubs or FPA forums. If there are issues and you are going to give a number it should be all seven steps. What does three steps accomplish? That is less than 1/2 of the steps. This looks like change for changes sake.
Patricia	Davis	Being in the industry for three years does not necessarily mean you are able to provide unsupervised care. Roles that are involved in at least 3 of the steps of the financial planning process should increase the candidate's confidence to help clients.
Matthias	Day	There are a lot of ways to get experience in one of the seven steps of the financial planning process without having any actual experience DOING financial planning. If the experience requirement is meant to keep people without any experience

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		doing financial planning from wearing the marks, which it should, then it makes sense to add this modification.
Garrett	Dearden	On the Job training is where you apply the CFP board standards to real life situation. More experienced professionals who have interacted with real humans and not books are needed not less.
Michael	Dechiario	Certainly professional experience in addition to passing the test and doing CE is important. Offering a pathway to use the marks by individuals who do not have the opportunity to provide the full planning process seems counter to the mission of the CFP Board.
Miguel	Delgado	It's true, 'experience' is relative. Someone is only experienced in only one area should not get the same privilege as someone who has experience with 5 areas.
Jonathan	DeMoss	I don't understand the proposal. If you're making it less difficult to achieve CFP I strongly oppose. If you're keeping it as is (individual needs some experience) or raising the standard to have more experience, I'm in agreement of that.
Bob	DePasquale	I think 3 of 7 is more descriptive and a good amount.
Kimberly	DeProspero	We have enough Advisors putting themselves out there as Financial Planners. I believe it is important to have the experience and ability to provide financial planning fully.
Lucy	Detwiler	I think this just makes the CFP brand stronger, so I support.
Ashish	Dhamal	I am not sure how you would measure this in the real world. Well-rounded experience with as many areas of personal finance should be the goal and limiting it to 3 may be disadvantageous to the candidate.
Vincent	Di Domenico	Advisors need some experience
Michael	DiGrazia	This waters down what we do and the public should not be exposed to any less experienced professionals.
Ryan	Dillon	I believe the current standard is sufficient and attracts a broader set of perspectives and candidates. The additional requirements would limit the experience and caliber of the candidate pool.
David	Doherty	I am not directly client facing in my role but still found the CFP® exam prep and designations I obtained to complete the educational requirements extremely valuable.
Brian	D'Orazio	Experience should involve the entire financial planning process.
Daniel	Dorval	Financial planning and advice involves more than one area like investment management for example. Requiring experience in actual financial planning seems reasonable to hold a Certified Financial Planner designation.
Dominic	Dougherty	This sounds good to me as a practitioner but I wonder if academics might be adversely impacted
Teresa	Duarte	I've submitted experience using just 1 step per original requirement but would need to revise to multiple steps if proposal is approved. Would I be allowed to update my experience? Would those candidates with experience already approved be allowed to move forward with less than 3 steps?
Renee	Duba	Competency in all steps should be required.

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John	Duda	Not at all for that provision as I believe it degrades the rigor of the designation.
Michael	Dunlop	I support the proposed change to the Experience Standard requiring candidates to gain experience in at least three of the seven steps of the financial planning process. This change raises the bar from the current vague requirement and ensures that candidates develop hands-on skills in multiple core areas. While it doesn't encompass the full scope of financial planning, it represents meaningful progress toward producing more competent and well-rounded CFP® professionals. Implementing this standard would strengthen the credibility of the certification and better serve the public by ensuring clients receive advice from advisors with practical, relevant experience.
Blaine	Dunn	A person who is a CFP® professional should be competent in ALL the financial planning steps, not just a subset.
Dylan	Dwyer	In my experience, the CFP designation has been helpful in helping people pivot their careers from a more narrow scope to a broader scope. I, for example, completed the CFP requirements while working on a retirement planning capacity. The CFP marks allowed me to get into a role that included broader financial planning responsibilities around taxes and estate planning, as well as retirement and investment management. This is a strong benefit of the marks and I suspect a meaningful piece of the candidate pool is pursuing the CFP for this purpose. Making the work requirement more restrictive for qualification threatens to dampen this use of the marks. I am generally in favor of increased rigor and exclusivity of the CFP designation but I don't find that this would be an effective way to do that.
Jacob	Echols	I believe this is a good idea, it would help strengthen the designation
Barry	Eckhardt	No comment
Ryan	Edmonds	I support this as long it can be any of the seven steps and not specific steps.
Larry	Elkin	The proposal overlooks the fact that financial planning is largely practiced as a collaborative process among multiple professionals working with clients as a team. For example, a senior adviser may meet with the client to establish goals, while an associate primarily works on implementation and monitoring under the senior colleague's supervision. Whether the more junior practitioner's work involves consideration of alternatives -- another relevant element of the process here -- is a highly subjective question. Imposing this requirement introduces arbitrary and subjective judgments as to the nature and extent of a younger practitioner's duties. Also observe that all current licensees are effectively grandfathered, regardless of the scope of their prior experience. Finally, 'the public' is not so keenly attuned to the CFP Board's standards as to have any awareness of this change, its significance or lack thereof. This modification serves no useful purpose.
Gina	Ellen	While I do think we need to incentivize more young people to join this profession (especially young women), I do not believe that making the requirements to obtain the CFP designation easier is the right way to go about it. If anything, over time, we should be raising the bar on standards not lowering them. These proposed



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		changes echo the loosening of standards in all fields across the country where I feel mere participation is celebrated these days, rather than striving for excellence. Attaining this designation means something. It's not easy, and that's part of the point. We each have to work hard and push ourselves to obtain more experience, more critical thinking, the ability to stick with the process over time, all qualities you need to have as an effective advisor to clients. I do not want this designation to slip and feel less important due to lower and lower barriers to entry, as I see that currently happening with university degrees. Let's keep our standards high so we know we're grooming professionals that will take EXCELLENT care of their clients and not fall to the lowest common denominator.
Kevin	Ellis	I don't see the need to get into that level of detail. Seems like over-kill and somewhat impractical. It should not be difficult to obtain relevant experience
Ivy	Emerick	The modification would strengthen the type of professional experience most beneficial to the professional's ability to provide subsequent unsupervised financial planning.
Angela	Epley	A sub-half minimum? Which 3? Simultaneously, or concurrent?
Morris	Esquenazi	I would actually prefer 4 of the 7 steps, as that is a majority
Harley Parker	Evans	Unnecessary change. Needles complication of standards.
Amanda	Farr	A lot of people in management roles obtain this certificate. They are not directly involved in the planning process but instead oversee the process. I feel there should be a proficiency path that includes some kind of supervisory role.
Jeff	Farrar	makes sense.
Christopher	Fasano	I am a proponent of the financial planning process and the impact coordinating the different disciplines has on client outcomes.
Joseph	Favorito	It waters down the experience level of the average CFP and dilutes the credibility.
Paula	Fedirchuk	A CFP(R) professional must have comprehensive experience; therefore, I would almost argue for at least four of the seven steps.
Tyler	Fedrick	We need to be careful about making the experience requirement parameters too constrained. The more constrained you become, the less likely a person will be willing to pursue the designation. I believe that its current requirement is the correct one.
Jonathon	Ferguson	This makes sense to me because the CFP mark indicates experience across areas, not just within one
George	Fernandez	I would support at least 4 or 5 steps at least. The principle of holding the certification is that you have demonstrated competency. While 3 of 7 is better than 'some', I don't believe it aligns with the CFP Board principles.
Ray	Ferrara	Financial planning is holistic. It includes all seven steps, not just three. How do you go from comprehensive to only three steps? I get that a new person may not actually be presenting a plan to the client - at our firm, we do not let someone give advice until they have the credentials to do so - but they can do so with a CFP(R) professional present. If you decide to keep this in place for someone seeking the designation without wanting to practice financial planning with the public on a day



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		to day basis, they should attest that they will not use it as a financial planner per se.
Emerson	Fersch	I worked with it financial advisor who was able to earn his CFP designation in six months. Six months! He trots out his credential, as if that somehow Indicates his competency. That's the problem with this credential. It's just become another settle letters after somebody's name.
Shelby	Ferstl	Agree / support
Russell	Fields	Yes, more specific and further defines 'some' that is in the current language.
Alice	Finn	See end
Kathryn	Fisher	In general, reducing the requirements for certification means that full-fledged CFPs may not really have the necessary experience to property assist clients. It is not good for the reputation of the profession and, more importantly, for the public we serve.
Tim	Fliam	I feel experience should remain a requirement and 3/7 seems to be a fair number.
Kathryn	Flom	I truly believe this will devalue the CFP designation. Is it about being educated and demonstrating competencies in comprehensive planning? If it's not about the whole process, then what is the purpose of having anyone do all the modules if you're going to allow other professions to just swoop in and hold the designation with less knowledge and experience?
Michael	Fogarty	I think this proposal is overmanaging the experience requirement.
John	Foote	CFP requirements are already strict. Why increase complications with more reporting requirements?
Jeremy	Forman	No change needed
Hank	Fox	I believe that modifying the experience requirement to address at least three steps of the financial planning process will strengthen the public's perception of and trust in a CFP professional.
Mike	Fox	Better, more well-rounded, professionals is a good thing.
Joseph	Franchi	Make it available to anyone trying to get into FINANCE!!!!
Kerry	Franklin	This sounds like a reasonable request.
Gloria	Franz	It is better to teach someone the CFP process early in their career versus trying to unteach what the have already learned in a system that is not always on the same path as standards taught by the CFP Board of Standards.
Guy	Fulcher	There are some designations that should require less, i.e. CPA. There are reasons so few can pass the exam.
John	Galbraith	Relevant areas provide more assurances that a candidate has the necessary experience to be a strong and competent financial planner.
Nora	Gallegos	The education portion is so unattainable. It's not realistic for current professions to justify a career change.
Ann	Garcia	I think this is great. There are too many public-facing financial services jobs that give the person no experience in planning but would nonetheless qualify them under the current guidelines. This is a great change.

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Rachel	Garner	This may need to be more nuanced to be effective (or allow more options to gain the needed experience) and could potentially be discouraging to new candidates who may not have the breadth of experience readily available to them.
Allen	Garner Jr	As an active practitioner with 50 years of experience, I can speak to the experiential side of application. Absolutely necessary!
Cody	Garrett	I strongly support this, especially as 'Implementing the Financial Planning Recommendations' and 'Monitoring Progress' combined can be viewed as administrative sales tasks separate from the financial planning relationship.
Stephen	Garrett	I am in favor of relevant experience as well as increasing the experience needed
Kenneth	Garwood	A candidate's background and experience level is vital to ensuring that the CFP program is attracting competent and experienced professionals to our industry.
Ara	Gasparian	I think that the education requirement along with the experience of working with/for CFP professionals, or experienced financial planners/investment advisors for the period of time set by the board is enough, and explicitly attesting to experience with 3 of the steps is not necessary. Especially given many candidates may be limited in their eligibility to practice several of the steps anyway (if they don't have any licenses, for example) and are acquiring their CFP marks in order to meet NASAA requirements for investment advisor representation. Also, if requiring 3 of the steps to be met, why not explicitly pick the steps that are required to be met, since they are likely to be similar for inexperienced candidates looking to start their career?
Mark	Gelbman	I think it is important that advisors show a commitment to comprehensive financial planning. To many advisors don't focus on the plan aspect of the profession and focus on implementing solutions. It is hard to justify your recommendations without having done planning first.
Matthew	Gelfand	This proposed change ensures a breadth of experience related to the financial planning process.
Marc	Genereux	I believe a broad base of experience is generally more beneficial to the growth of a professional so requiring three areas of experience is a good requirement.
Victor	Gersten	I support it
Michael	Gibney	The more, the better.
Amy	Gierak	While it is a good objective, how will this be proven? Will a supervising CFP practitioner be responsible for providing a testimonial statement?
Sarah	Gilkeyson	I think that there are a number of ways and positions in the industry that demonstrate a candidate's ability to provide unsupervised financial planning services and as long as those are demonstrated through their experience provided there is not a need for modification.
Jonathan	Gillam	As a candidate this proposal aligns well. In order to prepare best for the exam, the candidate should have ample experience in the field.
Allen	Gillespie	While work experience to financial planning is important, precisely identifying qualifying activities related to the financial planning process can be direct or indirect. Consequently, it can be hard to define. For example, a CFA may work on setting risk, return, and correlation assumptions that go into the financial planning

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		software. This is a non-client facing activity which precedes the 7 step planning process as outlined by the CFP board. The activity, however, directly impacts a client facing output from a financial plan, but currently as defined it would not might not be considered part of the 'planning' process.
James	Gillin	experience is necessary
James Hunter	Gilmore	As more CFPs enter the market, I'm having a challenging time finding job opportunities that help me qualify for the experience hours. Making the experience hours more stringent, will make it even more difficult for students to gain the hours required to earn the CFP marks.
Joseph	Gitto	Improved experience standards
Charles	Glasse	Better because sometimes planners focus on a particular planning topic.
Thiago	Glieger	General opinion is that CFP should belong to the highest educated and experienced professionals only. I've experienced many circumstances with wrong information being given to people.
Bruce	Glor	We are looking for well rounded experience, with the ability to view a client's situation holistically.
John	Godfrey	It seems to water down the requirement
Tim	Goodwin	That's certainly what they were educated on when they took the CFP exam, so requiring experience in at least some of the financial planning process seems to make good sense.
Tim	Graff	I question how this is going to be measured.
Lois	Gregson	Increasing the experience requirement will better prepare CFP professionals.
Andrew	Griffith	The financial planning process is unique to each client and provider even though it follows a basic model. Having experience in some aspects of the process is appropriate as a requirement. If a candidate has to have experience in all parts of the process, it creates some barriers to obtaining the CFP because some firms' management may intentionally prevent their staff from gaining experience in all steps of the process as a way of holding that employee captive. (I know that is a poor management process. Unfortunately, many people in management roles do not develop or even try to develop their employees.)
Kayla	Grodi	I think the definition of financial advisor is too broad these days and the relevant work experience needs to have more specific rules on what counts towards the professional experience component required.
Brandon	Gromadzki	Do not make the pathway to CFP easier. CIMA doesn't target the same content and it is vital to uphold the pedigree and expertise of the designation by ensuring uniformity in education from those that hold the marks.
Kathryn	Grover	I believe this change strengthens the CFP competency standards by requiring a more well-rounded set of experiences within the 7-step financial planning process.
Joshua	Guadarrama	While most of them are intuitive and can generally encompass the duties of an FP, they are all still important skills to learn, even if they are not working on 3 of the steps at a time.

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Phil	Guerrero	This would completely water down the brand in my opinion which could range from 'social media experts' to insurance agents, part time tax preparers, etc. Largely I've found people who are CFP's follow the steps and lowering the bar down to 3 steps to qualify makes no sense. Trust and industry experience typically go together. Removing experience lessens it's quality. I strongly oppose this proposed change.
Jake	Guller	Experience that addresses at least three of the seven steps of the financial planning process means that the profession will lean more toward comprehensive, holistic planning. This experience change would help the public more clearly differentiate between those providing financial advice and those providing financial planning.
Brandon	Gunderson	All CFPs need professional experience.
Kayla	Gunderson	I think there needs to be more rigorous standards.
David	Haas	I think this change may be problematic to verify properly. The idea is interesting, but does it really add a lot in practice? If a mortgage broker is going for their CFP and passes their exam, they may claim that they are hitting 3 of the 7 steps in their work, but the truth is that they are probably only looking at very narrow views of a client's financial situation. Its very different from a paraplanner working for an IRA and doing comprehensive planning under a CFP's direction. How will the CFP board evaluate the difference in these two cases?
Michael	Hadley	Why are we making this easier? The pass numbers are up, the test seems to be easier than years past, there are more CFP's than ever now, why are we watering it down further, if anything the test should be getting harder and this should be the 'super bowl' in financial planning not common place.
Ted	Haley	From personal experience I know that some CFP professionals have 'satisfied' the experience requirement with questionable work history, strengthening the requirement would benefit the mark in my opinion.
Forrest	Hall	I agree that there should be an experience requirement
Larry	Hall	Not sure why this standard should be relaxed
Thomas	Halonen	Having real life experience is critical in fully understanding the various parts of comprehensive financial planning. You cannot replace experience with education only.
Jason	Hamilton	I dot support it.
Trent	Hamilton	Honestly I support but I'm trying to get my experience within the deadline right now and that will just make it harder. Sounds like a good change though.
Kade	Hammes	I'm not 100% sure what this is asking. Why wouldn't experience have to address all 7 steps of the planning process?
Diane	Haneklau	This could allow more lawyers or non-financial professions such as corporate or ministerial employees to become part of our diverse membership.
Noah	Hankin	I believe it should be mandatory to follow all seven steps of the process to truly demonstrate that you deserve to be recognized as the gold standard.
Allison	Hanley	I think they should have experience more than three steps.

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Michael	Hanrahan	There be an hour requirement, such as, 'at least 1,000 documented hours providing direct services in 3 of the 7 financial planning process'
Renee	Hanson	Comprehensive planning includes the 7 key areas. While some areas may be less relevant to a client it is critically important a CFP reviews all 7 areas. By minimizing to 3 areas we are diluting comprehensive planning and the credentials. I feel it important to show competency in all 7 areas.
Parker	Hanson-Harden	It is important for professionals to be well rounded in services they provide, and 3/7 of the steps is fair to be a minimum standard to become certified.
Mingming	Hao	We want to strike a balance between rigor and feasibility for certification
Danielle	Harmon	I am concerned that there would be certificants that aren't experienced enough.
Dean	Harris	After course work completed and passing the exam independent financial planning should count for experience with an attester proving the work.
Jessica	Harris	Experience is different for everyone and the education component should be thorough enough to provide clarity. You don't need experience after passing the bar exam to be a lawyer, why do you need it for financial planning? Let the education speak for itself
Josh	Harris	Strongly support
Adele	Harrison	To maintain the high standards of the CFP designation, I believe candidates should provide evidence of experience in more than half of the required steps. I would support setting the number at four of the seven.
Andy	Hartsman	As much industry + client facing exposure as possible prior to obtaining this certification is critical for both understanding, and, to ensure CFPs do the right thing by their clients.
Ryan	Harvey	If we want the CFP credential to be recognized as a high standard, we shouldn't weaken it in this way. All 7 steps are essential to the process; why require experience with less than half of them?
Michael	Hathaway	What is the purpose of this change? What is the expected result of this change? My guess is that the result will be even more 'CFP in name only' certificants. Is that good for the industry? Is that a consideration?
Stephanie	Hays	The education required to become a CFP® professional encompasses how to provide a holistic financial planning approach to a client's needs. Experience in more than one area is crucial to applying the knowledge in practice not just theory.
Lindsey	Heglar	I think the proposed changes would give more credibility to the CFP designation. For example, currently, a CPA can request to take the exam, although they have no financial planning experience.
Daniel	Heidel	I feel that the experience hours pathways should remain rigorous to keep the CFP standard difficult to obtain in order to elevate its standards. By requiring at least three steps to be completed, it should weed out some potential candidates that are not accurately prepared to enter the profession as a CFP professional.
Anthony	Hellenbrand	No strong opinion.
Tiffany	Helleson	Three steps seems like a very low bar for the rigor and excellence that the CFP® marks carry.

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Brenton	Helms	I do feel that this change be added at a minimum. I feel that you should have experience in most, if not all, of the seven steps.
Tyler	Helton	I think the new rule would be very subjective and would be difficult to report/monitor.
Kathryn Shea	Henningsen	Each of the 7 steps is pretty critical... and I believe they should have experience in these 7 steps so they can truly provide a complete and thorough unsupervised financial planning experience to a client. I think this would detract from the power and credibility of the CFP(R) process.
Bradley	Herd	Variety of experience is critical to later success as a CFP(R) Pro. Doing only one step for thousands of hours is not sufficient.
Matthew	Hess	this would encourage career growth for those committed to the profession - think this is a good idea and requires an employer to encourage involvement in planning and investment in their employees
Joshua	Hester	Great proposal, I would argue it does not go far enough, but I understand that many CFP aspirants roles may not make this easy.
Sam	Heveroh	I'd support this but be interested in seeing which of the 7 would be a requirement. I don't think it should just be any 7. There should be at least 1 that is required for all.
Kam-Lin	Hill	There is various level of standards for wide coverage when come to professional experience in financial planning to different professionals or individuals from all walks. Current requirement of 6,000 hours of professional experience in financial planning seems to be reasonable.
Jesse	Hindson	Moderate support for this proposal. This could help a lot of younger people if they wish to pursue the designation.
Deb	Hinton-Brown	Since the modification is not outlined, I think some steps are more significant than others, it is not possible to form an opinion
David	Hoffman	This seems to align the letter of the standard with the intent, as I would guess it. It makes sense.
Patrick	Hoffman	If we, CFP Board, wants to keep public trust, why lower standard by requiring only 3 of 7 steps?
Garrett	Holcombe	This muddies the standard and makes it completely subjective to whoever is reviewing the experience. Experience in the field comes in many different ways, and the coursework and exam weeds out those who won't be a fit. This is unnecessary.
Cheryl	Holland	I prefer this more detailed explanation although my preference would require experience in all seven steps of the financial planning process. Why have seven steps if you don't have experience with all of them? It's an iterative process, and you can't do investments without knowledge of cash flow needs and you can't do cash flow needs without knowledge of goals, and you can't do investments without knowledge of taxes, etc., etc.
Benjamin	Holm	If a person is passionate about financial planning, then they will be incorporating the steps already.
Scott	Holman	Too much regulation.

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James	Honaker	My feeling is; most wealth managers think they are doing financial planning when in fact they have no idea what real financial planning is about. Unless they are doing estate, trust, will, document debrief, asset protection, business owner private market exit planning, they aren't doing financial planning. These individuals are obtaining the marks but they aren't doing financial planning and therefore shouldn't be able to categorized and providing professional experience to those who want to be and serve the private sector as trur financial planners. We, Wealth Optimization Network, LLC are true finaicail planners with three dividisions in house. Finanical Planning Division, Wealth Management Division, Product Implemenstion Division.
Adam	Hopper	Experience within the financial services industry and specifically serving clients needs is a part of learning and growing into a strong financial advisor.
Pamela	Horack	Not everyone with a CFP certification has front line experience with clients. Many are back office personnel and those with specialty investment expertise. While they may want the CFP designation, they may not have the opportunity to assist clients directly with three of the seven steps of the financial planning process.
Josie	Horn	While I understand and support the idea that CFP's must demonstrate a high level of competency in order to effectively serve clients as someone who is entering the profession as a career changer I already feel that there are many roadblocks to achieving certification due to the experience requirement and the timeline in which you can be certified following successful completion of the exam portion. Although I believe that having relevant experience in three of the seven steps would be helpful in looking at the jobs available to entry level candidates pursuing CFP certification I think it would put undue hardship on both candidates and the profession as a whole by making it more difficult for career changers to enter the profession. This is partially also due to the fact that experience hours are required to completed within a limited time frame after completion of the exam, if this standard were to be altered it may have a beneficial effect.
Aaron	Horne	It is unclear if this new requirement requires that each experience hour cover at least 3 steps, or if a minimum hours in each of three are required. For example if 'Identifying and Selecting Goals' is one of the 3 steps, does it need to be done for 100 hours minimum, while another 'presenting the recommendations' might also be done for 100 hours minimum, comprising a total of 200 hours of experience. Without those details, I generally don't believe this is a good way to go. It is already challenging enough to meet the experience requirement, especially for me. I am coming from a career in software engineering and starting with the CFP(r). My understanding is that I will have only 5 years to complete 3 years of directly applicable experience. I'll do my best, but I am worried about it. Adding additional requirements about the kind of experience I am able to get, will only make this requirement more cumbersome. Are you having trouble with authorizing the credential for insufficiently experienced CFP(r) practitioners?
Landon	Horne	I believe the 7 steps embody a fiduciary. 3/7 would offer a lower standard of care in certain cases to bypass the integrity of the CFP certification



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Thomas	Horne	While I think that experience is necessary to provide financial planning services to clients, I think a wider breadth of types of experience should be accepted.
Justin	Horowitz	It is overall beneficial to ensure a CFP applicant has more experience of the financial planning process.
Brent	Horvath	I think the original standard is fine. This seems to add unnecessary tracking and reporting.
Jonathan	Hoskins	Implementation of the process and showing an understanding of the key concepts should be a part of the path and needed for coursework.
Thomas	Houchens	Th
Jim	Houghton	This is a worthy requirement. Just would want to further understand how in depth and how long these experiences would need to be, as that could be difficult for some professionals to attain.
Jonathan	Houk	Acceptable ONLY if this increases the standard for demonstrating competency.
Kyle	Householder	I think this proposal would make it artificially more difficult to meet the experience requirement for those new to the industry. There are many roles in our industry that may only be involved in one or two steps of the process that provide valuable experience.
Brian	Houts	the experience requirement is weak now, when I was applying for my CFP I was able to include work experience that had no relevance to providing real advice to real people.
Johanne	Hove	N/A
Adrian	Hovey	I would support a stronger level experience as well - maybe all steps? On the job training is super important.
Alec	Hubbard	The downside of this change is that it seems to be proposed by insiders to validate insiders. New potential CFP candidates deciding whether or not the CFP is right for them wouldn't necessarily have exposure to how CFP defines the financial planning process, and so to the people who need to understand the pathways to attain a CFP this change actively makes their experience with our organization more difficult and worse. On the other hand, the upside of this change is unclear. We exclude experiences that works with exactly 1 or 2 steps of the financial planning process? It's not clear to me what those kinds of professional experiences are (IE in my experience it's hard to work in a role that isolates one or two of the 7 CFP outlines). Therefore, even if we exclude some narrow segment of work experience for qualifying for the standard pathway the benefit of being slightly more rigorous is outweighed by the importance of candidates and outsiders who employ CFPs to clearly understand our process.
Benjamin	Huber	Adding specificity to the experience requirement enhances knowledge and increases credibility from the beginning
Joel	Huet	I feel it is important for the CFP brand to grow with quality people. I believe this change makes sense.
Lisa	Hunter	By definition a CFP is supposed to have competency in all 7 steps. In my opinion experience in 3 of the 7 contradicts this expectation and will end up creating levels of CFP competency. On a philosophical level, if you don't have experience in all 7

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		how can you really understand how the 3 you do have experience relate to the other 4.
Colin	Hurst	I think that requiring experience in multiple areas better prepares the professional.
Joseph	Huston	it helps the candidate fulfill the requirements; gives then a partial picture of the bigger picture
Dave	Hutchison	Sounds ok...
Christine	Ingesson	Is the proposal requiring more or less experience? I don't understand from how it is posed. I think experience is essential to becoming a CFP. I agree with more experience, not less.
Amy	Irvine	Since the idea of financial planning is holistic in nature, it is important to have expenses in those steps.
Jacob	Ivey	Good increase in standard, broader base starting point
Brian	Jackson	I agree that this is a useful measurement for what type of experience counts towards the requirement.
Lori	Jacobson	May shut out pathway for certain financial professionals to become CFP®s
Richard	Janes (Charles Schwab)	We do not agree with this change. It would result in limiting access to the CFP designation for individuals in a non-client facing role such as leadership, offer management, project management, etc. where the CFP designation is still beneficial.
Dominic	Javier	Personal financial experiences may fall as part and parcel of financial management of a business/enterprise under Sole Proprietors, General Partnership, LLC, S-Corp and/or C-Corp. System management and financial advisory roles should be maintained as the bench qualifications towards the standard.
Bryce	Jenkins	This turns the acquired knowledge into wisdom.
Robert	Jeter	I support raising the bar and making sure the experience is relevant to the curriculum.
Carol	Johnson	Financial planning is a process that involves many aspects of a client's financial well being. Someone who only provides investment advice or risk management is neglecting the other parts of the process.
Annette	Jones	Highly support the proposed requirement for applicants to have experience in at least 3 of the 7 steps.
Audrey	Jones	I think that the standards are already high enough. If you make the standards too high, there will be less CFPs.
Douglas	Jones	I dont think this improves it. The CFP course is robust and trains those that may not have planning skills to gain them.
Conner	Jordan	I think 4/7 would be a more appropriate number than 3/7.
Kevin	Jordan	With the professional requirements in our industry so rigorous (with good reason), there will be the temptation for applicants to choose the easiest path toward certification. Changing this standard will lead to applicants looking for loopholes to prove they've obtained experience in 3 of the steps instead of proving their capability as fully-trained financial planners.

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# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

First name	Last name (c/o firm name, if applicable)	Response
Joshua	Justice	I support the proposed changes as it ensures that future CFP certificate holders are more well-rounded advisors who have experience in providing the full spectrum of financial planning services and are not niche specialists.
j	k	There are 7 steps to the financial planning process?? Is that new??
Henry V	Kaelber	Less understandable by the general public and potential new certificants
Melanie	Kahrs	I support this change! It provides more clarity and is more precise. Also helps applicants get their feet wet and have some experience in the financial planning process.
Michelle	Kaicener	It seems to me that the whole process is becoming overly complicated and geared towards very high wealth clients.
Matthew	Kalajian	When I taught coursework for folks seeking the designation I was many times suprised what qualified as 'experience'...attention to this standard is important.
Janel	Kalish	I support this as it will show that they are better suited to provide the services required of a CFP. If they are only tax focused or insurance focused in their work, they don't look at the whole picture for the client
Zach	Kammeraad	I don't have a strong opinion on this one.
Hooman	Karbasion	Not sure how one can demonstrate the three steps based on previous experience. Not all institutions or FA's have this experiance. Dealing with the public while working in the industry is a good barometer for experiance.
Jennifer	Karch	I believe that having some experience in the industry to start before getting the CFP is remarkably helpful in understanding planning principles in the first place and being able to demonstrate understanding of at least half is helpful.
Ashley	Keamo	The wording here is a little vague. Does this mean that every experience submitted would be required to include at least three steps? Or does it mean that at least three experiences submitted would need to be different steps in the process? If the former, I think that is an unnecessary burden on individuals who are trying to get their hours in various ways.
Kathleen	Kee	In order to understand the planning process, one needs to have experience in each of the planning areas. 3/7 is not showing competence. When you sit for the bar, the CPA exam, you have to pass each component, not just parts.
Jean	Keener	This seems like a good change that would avoid people holding the CFP(R) marks without any real financial planning experience.
Patrick	Kelly	This makes sense to me. I was unaware the the experience could have pertained to less than three steps. This seems hard to track and monitor for both the board and applicant
Vera	Kelsey-Watts (Saltbox Financial LLC)	It should be WAY MORE! At least 5 of 7 or ideally, 7 of 7
Elaine	Kendell	The current standard is too vague.
Kit	Kenny	I see the CFP Board simply evaluating the applicant on a personal basis. What profession are they personally in at the present and the financial planning aspects of that profession.

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First name	Last name (c/o firm name, if applicable)	Response
David	Kinder, RFC, ChFC, CLU	Who exactly are you trying to attract to your credential? This applies to one kind of person: The university graduate who has a job as a paraplanner and wants to fulfill the experience requirement. Real advisors and insurance agents already in the field are not going to bother keeping track of all this just to have CFP after their name. I have 20 years experience, hold RFC, ChFC, and CLU designations. I don't have time to bother with such micro-management. Or... have you decided that all you want to attract are those who are university graduates? If that's the case, just be upfront about it.
Eric	Kirste	I believe the education standard should remain in all areas of financial planning. As I agree with adding the CIMA as part of the education component, on job experience in those other areas are crucial.
Andrew	Kish	The CFP standard should include proficiency in multiple steps in the financial planning process to better serve the American public.
Reid	Kitagawa	The tasks and position title may vary, but the candidate should be required to have experience with the financial planning process in real world situations.
Ryan	Kittrell	Some people are more highly focused in a certain area and don't use at least three steps.
Kurt	Klobassa	The experience standard is already nitpicky enough
Alan	Kneale	If experience is key to certification it should cover a broad scope of the job just as would be required of a solo RIA doing financial Planning
Michael	Knight	My belief is that experience with the first four steps is critical for CFP(R) competence and credibility.
Robert	Kocembo	Greater thought as to the quality of the experience chosen.
Joseph	Kochera	In my experience, having the context of the knowledge CFP delivers, makes the lessons of the course work and certification process more relevant and thus are internalized.
Kristine	Koczajowski	Would also support at least 4 of the 7 steps in an effort to ensure the candidates have more than 50% experience in the financial planning process.
Alexander	Komrovsky	Should have some kind of business within financial planning prior to getting CFP
Joel	Koon	If a CFP® applicant is not working within all 7-steps of the financial planning process, so that they could be under the accelerated pathway, they should at least have to be working within half of the steps to be considered under the standard pathway. I honestly think an applicant should have to work within at least 4-steps in the financial planning process for their experience to be counted under the standard pathway, but I believe this is a good step forward.
Brian	Koonce	Experience matters the most of anything.
Paul	Kopey	Although this sounds like a good idea, I wouldn't want it to discourage or prevent young professionals working in tangentially related fields from seeking to obtain the CFP certification.
Brian	Korb	The current experience requirement is rather vague, so adding the requirement to demonstrate at least 3 of the 7 steps is a good move.
Skerdi	Kostreci	Yes, the more requirements for new certificants the better.

First name	Last name (c/o firm name, if applicable)	Response
Mateusz	Koszarek	In my opinion if, as a professional, you can't prove that you're doing planning why would you hold the CFP marks? I don't think that three of seven steps of the financial planning process is enough.
Lucas	Kraft (Financial Planning Association of Wisconsin)	Specific experience in financial planning should be required. Not just industry experience.
Ross	Krause	It is very important to have actual and direct financial planning experience. this profession is all about hands on experience.
Austin	Kunzler	Requires more relevant reporting.
Bryan	Kupchik	I believe the Standard Pathway should require experience that address ALL seven of the financial planning process steps - especially if a planner is providing services to the public at large. Why demote the level of expertise and experience to address less than half of the entire planning process? That makes no sense.
Julia	Kwok	The proposed changes set a clearer guidelines for hands on experience needed for achieving the competency level.
James	LaFleur	I believe the pathway is too restrictive today.
Ching	Lam	Related financial working experience for qualified CFP is necessary.
Lars	Lambrecht	This seems very reasonable.
Cristian	Landry	What are the grounds that warrant this? I suppose it just depends on why we would want to implement this change? Do we think it would lower the overall quality of our class?
James	Larson	Yes, you should be able to demonstrate your apprenticeship in financial planning with the CFP designation as a crowning exemplary certification that remains 'The Gold Standard' of our profession.
Daniel	Lash	I think the current standard is fine and the proposal of experience of at least three of seven steps seems like candidates should already have this in the time experience in current standard.
Laura	LaTourette	sounds reasonable
Michael	Laura	Not sure if there is a minimum number currently for the Standard Pathway. The proposed addresses 'at least 3'. How many does the current standard require?
John	Layug	I believe you need to complete the entire financial planning process, not part of it.
Danielle	LeChard	Fully support
Kristen	LeClair	Terrible idea. Again, you are just suggesting that the bar be lowered. Why would we compromise the integrity of this certification?
Michael	Legge	Yes. Although passive experience in a support role (such as a CSA or an associate level role) should remain as well.
David W	Lentz	It is hard to get experience one area let alone three without the credential.
Nan	Li	Should give Initial certificants some more flexibility on this end as they developing their practice.
Darren	Liberski	I feel that a person should have knowledge and experience in this work specifically, prior to getting the certification.

First name	Last name (c/o firm name, if applicable)	Response
Jason	Light	I read this to be a increase in the standard of experience which I support.
Malcolm Leighton	Liles	Relevant work experience is sufficient and should be evaluated on a case by case basis. No need to be more specific
William	Liles	I think the vagueness of the current standard is appropriate. There needs to be some flexibility here.
Vance	Litchfield	I understand the need to increase membership. However, as you lower your standards you increase the chances of another organization being perceived as the symbol of excellence. People need to respect the designation and feel they achieved something. If everyone has one, it's not a way to distinguish yourself. The designation loses relevance.
Houston	Little	Understand this, as just the current statement is quite general. However, I don't think you should penalize someone who has goals of being an advisor who has yet to have the capacity to work as one. Keep in mind, in the future this could work its way up to 4 then 5 pieces of the financial planning process, etc. Then, only current, practicing advisors could get the CFP.
Maria	Litzinger	It seems that this loosens the standard, of which I am not in favor.
Guo	Liu	Currently anyone who sells life insurance can easily obtain the 6,000 standard experience hours, without practicing comprehensive financial planning. I agree with the increased requirements. I only caution that this may reduce the number of folks from underrepresented groups who become CFP professionals, so we need to increase outreach and programs for those groups to balance that out.
Thomas	Livaccari	My feeling is that more experience is better
Chad	Lively	I've felt that the experience requirement has been far too relaxed. I believe that candidates should be required to have very clear and direct Financial Planning experience than the current standards require.
Robert	Livingston	YES - Many of the designations on the Accelerated Path do not necessarily have experience in anything outside of their specialty. For an example, a CFA could spend their entire career as an analyst and never gain an experience with working directly with clients. They should not be allowed to short cut the process by taking a capstone course and become a CFP.
Bill	Lloyd	But, how would you ever monitor this requirement?
Kimberli	Lo	I think this is an important distinction. I have worked in previous organization where management decides a 'CFP' is a great designation for everyone to have but just a handful of candidates are either qualified and/or will actively embrace and engage on an on-going basis. So the majority ultimately end of failing or dropping out.
Noah	Londer	I agree.
Paulo	Lopes	I support the proposed change to require experience across at least three steps of the financial planning process. This ensures candidates gain well-rounded, practical experience rather than specializing too narrowly in one area. The financial planning profession requires a broad skill set, and this update strengthens the experience requirement by ensuring new CFP® professionals have

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

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		meaningful exposure to multiple aspects of client work. This change will enhance the credibility of the CFP® certification and better prepare candidates for real-world financial planning.
John	Lopez	The 7 steps were carefully adopted by the Board and reflect the nature of a comprehensive financial plan. Having only 3 of the 7 steps would, in my opinion, degrade the strength of the CFP(r) designation.
Susan	Lopez	I feel that expertise in 3 areas is not necessary
Tonya	Lore	I came from the Asset Management side of the business. If I had to wait 3 years to use the CFP designations it wouldn't have been as beneficial to starting my practice and I may have decided against it for that reason. Job changers need to be recognized for their experience in the investment industry as well, there shouldn't be further hurdles to becoming a financial advisor.
Pamela	Lorenz	five of seven would be better
Alicia	Love	Provides clarity which is appreciated
Kristina	Love	With over a decade of experience in this field, I believe it should hold more weight
Eric	Lowder	This is only the second question but it seems like you are attempting to dumb down the standards to increase revenue. In the long run it will ruin the designation.
David	Lowe	This creates too high a barrier of entry for aspiring CFP® professionals who currently do not work in the financial planning profession. As a career changer from journalism, I know how difficult it is to find opportunities (especially paid opportunities) to work in even one of the steps of the financial planning process. Also, once a candidate does good work in one of the seven steps, s/he typically will gain opportunities to work on additional steps of the process. Therefore, the three-of-seven requirement is an unnecessary burden that will make it more difficult to attract motivated and qualified candidates to the financial planning profession.
April	Lowery	Must have some experience in the field
Alejandro	Lozano	I like this!
Matthew	Lugar	support
Timothy	Lux	This may provide a larger candidate base that largely lacks the appreciation or dedication to the full planning process. THIS ALSO ALLOWS NON-PLANNING FORWARD PROFESSIONALS TO EARN CREDENTIALS THAT ARE NOT REPRESENTATIVE OF THEIR PROFESSIONAL SERVICES OR EXPERTISE.
Christina	Lynn	I think we as a profession are headed in the direction of more specialized niches, and less generalists. Don't tie our hands by now telling us we need to be generalists.
Ali	Mahbod	Yes they should at least 3 of th3 7
DJ	Mahler	Don't change years of experience.
Casey	Mahoney	what does this even mean in practice? this sounds like nonsense/just more hoops to jump through.
Charles	Maina	Broadens the net by allowing incremental steps to the process.

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# CFP BOARD

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Bonnie	Maize	There are many ways to be involved in the financial planning process and this will help qualified applicants become certified faster.
Stephanie	Malewski	The difficulty will be in terms of validation that an individual has actually performed at least three of the 7 steps of the process. If the CFP® Board provides an avenue for an internship where an individual has been working FOR a CFP®, then it is a viable option.
Mason	Malozzi	I support this as it will help establish a higher and more current standard to the CFP requirements.
David	Mannaioni	I like that this supports more comprehensive financial planning.
Joseph	Manno	there is already an experience component and I don't think making this more specific to 'at least 3 of the seven steps' make this any more helpful.
Santo	Marasco	Strongly oppose. Disincentivizes new/prospective advisors from pursuing marks. Would prevent enablement/support professionals who are critical for CFP advisor success from pursuing marks. E.g. wholesalers of financial products would need to be able to get the marks still - advisors rely on wholesalers to elevate their business and better serve their clients. Wouldn't a CFP professional want to be working with another CFP professional who understands the financial planning process and ethical standards? In short, the education and exam is difficult enough to keep non-planning professionals from pursuing the marks. For those who want to apply themselves to better serve their advisors, their own families, and set the stage for transitioning to an advisor role (as many wholesalers do!) the experience requirement would be a roadblock. I don't believe the CFP community, clients of CFP professional advisors, or financial society as a whole benefits from shutting out people who are not doing advisor work day in and day out.
John	Marchand	Again, please see the previous answer. I come to this industry from 25 years spent in the de-regulated electricity markets doing complex structured transactions, and finished as a CCO who did a \$180 Million Gridscale Bess Construction Finance project, as well as a sale of the project. In addition, I created and managed Groups doing Financial modeling, transmission modeling (A huge exposure in Electricity), and risk management plus the team leading the negotiations of all offtake. While, not specifically planning per se or CFO work surely there is (time) value in that work that could and should count towards professional time. Happy to discuss further if you want to contact me either via email or tel/text.
Carey	Markoe	I believe the broader scope of the current standard is more applicable despite no exact number being used.
David	Marotta	Three of the Seven Steps is Four too few for comprehensive financial planning.
Kenneth	Marshall	Why only 3 out of 7? To demonstrate professional ability to the public, why not 4 out of 7?
Sheri	Marshall	Some level of experience should be demonstrated in the majority of the steps, not a minority, in the financial planning process; therefore I would suggest at least 5 of the 7 steps.
Leo	Marte	This requirement will improve the quality of initial CFP® certificates and further validate that they have the preparation to deliver advice to clients.

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First name	Last name (c/o firm name, if applicable)	Response
Bruce	Martin	It is reasonable that three of the seven steps show experience.
Maria	Martin	While I support this change, I believe it is critical to carefully explain how to qualify experience into these categories. For new professionals (especially those right out of school and do not have much experience), trying to relate what they do on a daily basis into what hours this qualifies for, could be confusing. For example, if half of their day is used for internal office meetings, is this allowed to qualify for experience hours? Clarification on what is a qualified experience would be helpful.
Paul	Martin	I believe experience related to the CFP planning process is very important. Candidates should have at least 3 years in related field experience.
Barbara	Martinez	As a financial coach and AFC, I have seen firsthand that financial planning is more than just investment management it requires holistic, client-centered thinking across multiple financial domain
Mitchell	Mass	I feel being more specific will hold a higher bar for achieving the experience standard. This will assure the CFP® has real world experience prior to receiving certification.
Kevin	Matthews	I am not so worried about how many steps have been completed but rather within what setting. I have over 20 years of experience in tax preparation, review, and consultation. When I went through my certification process, my certifier had questions about how my process matched what the CFP Board was asking. Since he was not a CFP, this might have been part of the problem; however, a significant issue regarding this is when we are doing tax planning for our clients, we are talking about one aspect of financial planning. I think that guidance is based on some people who might have different but relevant experience. For example, having an example plan for someone working directly in a typical Investment Advisory firm, someone who worked in a CPA firm that prepares tax returns, or someone who teaches accounting and wealth management classes (what kind of classes count and what kind of programs are not helpful, as I am also a professor at a college and I teach tax including tax planning). One thing that we hold the standard as auditors, have sufficient documentation that someone can reperform your work without asking you about it. If a CFP is certifying this, this is likely no problem, but if we are going to allow people of other designations (like CPAs, PhD and EdDs with relevant experience), we need to be prepared for the certifiers to have sufficient guidelines to make proper recommendations.
Christy	Matzen	Great improvement
Rick	Mayo	First of all, I don't know what the proposed standard means. TIME in the business is the key requirement to demonstrate commitment to the industry. If you want to make a change to this, do so with the expansion of what the time commitment entails. For instance, a bank manager who faces clients day in and day out has as much experience and someone at a mutual fund call center.
Noah	Mazur	I can't recall quantifying 'have some professional experience in the personal financial planning process', so if being more specific solves for this ambiguity, that would at least make some sense.

First name	Last name (c/o firm name, if applicable)	Response
Jeffrey	McClure	A sales-oriented broker-dealer representative or insurance agent may have three years of experience as a financial salesperson in a client-adverse role, but in my opinion, that experience detracts from the role the marks represent.
Steve	McConnell	I agree that the experience should be relevant to demonstrate competency.
Jack	McCormick	I think experience is necessary and I would not have been well equipped to pass the exam and course work without a mentor and my three years of para planning experience.
Kyle	McCune	If I am understanding this correctly, this makes the requirements more strict, which I support. This will help ensure certificants have the same or more similar training.
Justin	McCurdy	Yes - this requires greater and broader experience and improves the quality and rigor of becoming a CFP® professional.
Jude	McDonough	I think more details on the experience is prudent and will produce higher quality candidates for certification.
Catherine	McDougall	Professional expertise is currently a joke. It is self reported prior to the exam or after the exam. Unless you are going to have a better metric and actual standard for the submission there is no point in having this standard. Does the CFP board ever reach out to the supervisors that CFP candidates put on their application to verify? Yes candidates ethically should not be fabricating their experience, but I have to believe some are.
Ryan	McGhee	If we're holding ourselves out to be financial planners and the CFP designation ensures some measure of experience I feel the experience should be closely related to what a CFP actually does.
Thomas	McGrath	In a sea of alphabet soup, there needs to be a way to demonstrate to the public that the individual is competent with whom they are working. If someone is pursuing the CFP(R) marks, most likely they are already involved in the financial planning profession and I do not feel that we should back down the competency standard. I am for all for inclusion however there needs to be integrity while using the marks.
Alan	McGrew	The new standard will help provide better qualified candidates in that their professional experience is more directly related to financial planning.
Aidan	McGuire	I believe that the current standards ensure a baseline level of experience which provides for CFP professionals being qualified but not subject to too harsh of qualifications
Tricia	McIntosh	Requiring candidates for CFP Certification to demonstrate experience in at least three steps of the financial-planning process, including the gathering and analysis of client data and insurance needs, tax planning, retirement and estate planning should produce a better-rounded CFP in the end. Participation, along with a certificated CFP professional, in client meetings to establish the relationship and to present recommendations, would help develop interpersonal skills. Altogether, participation in as many steps as possible should help candidates for CFP certification determine whether becoming a CFP professional is a good fit.

First name	Last name (c/o firm name, if applicable)	Response
Ben	McLintock	I like adding this additional clarification to the qualification process. CFPs should have broad experience in all areas of financial planning and this helps support that goal. Additionally, I would think that the more practical knowledge and experience a candidate has on multiple steps in the financial planning process before they attempt to sit for the exam would only increase their chances of passing on their first attempt.
Kiernen	McTaggart-Ivezic	The changes reflect the hands on nature of the job, having experience directly related to the objectives of the CFP certification is useful.
Greta	Messarra Woodward	I understand the outside designations (CPA, PhD, etc) have value in the Financial Planning process, but they should be required to demonstrate more of the Financial Advising aspects
Christine	Messmer	Let it be as is - it's fine.
Cynthia	Meyer	Shouldn't a newly minted financial planner gain experience in more than 3 of the seven steps?
William	Meyer	Practicing is good. I don't want a CFP with only book experience.
David	Middleton	This makes sense. Someone with only a very specific experience path needs some broad exposure to other elements of planning.
Jordan	Miles	Currently the standard only requires that one of the seven points of the practice standards be met. I feel confidence in the profession would be better built if more points were required since it more approximates financial planning, not just a piece of it that could be very administrative or ministerial in nature.
Aaron	Miller	I think this lessens the CFP designation. Lowering the standards to get more people in the group lowers everyone.
Dan	Miller	We need to stop making it easier to become a CFP! Before long, it will no longer be the premier designation of our profession. Three year work experience under a CFP in all areas of financial planning!
Ethan	Miller	It can be hard for career changers to get the types of jobs that provide more robust experience without already having the CFP(r) marks. Narrowing the type of experience accepted makes it harder for career changers to gain experience.
Michael	Miller	If you knew that the CFP was never going to advise in the other 4 steps, I might be inclined. Not having any experience in four of the seven is too lenient.
Patrick	Miller	the CFP designation helps us broaden our scope. many of us start in roles where only a few aspects of financial planning is apart of our role. it limits those who are deemed eligible to sit for the exam as it stands
Ronald	Mims	I believe that as the financial world evolves, so must we the financial adviser.
Zachary	Mineur	Seems unnecessary.
Michelle	Minisci	I like that our designation demonstrates knowledge beyond the book
David	Mitchell	'relevant' experience makes perfect sense
John	Mitchell	I think this is trying to addrss the CFP designations being given to accedemic reserachers without ever having worked with the public. I am strongly against this practice and encourage the board to change direction. The CFP designation is

First name	Last name (c/o firm name, if applicable)	Response
		about working with the public. These are skills that involve people, not just statistics and numbers. Offer a different or modified designation for reaserchers.
Pablo	Montalbetti	I think is more about keeping it simple with less steps and keep improving the exam and the capstone.
Michael	Montante	Too much minutiae. Stop micro managing by rules.
		I strongly oppose this standard change because it will drive more confusion without the intended benefit of ensuring higher quality of experience. I have trained thousands of aspiring CFP professionals and we frequently field questions about experience requirements. Adding a requirement that mandates work across three of the seven steps will likely lead to more confusion, as candidates struggle to understand what qualifies and how to document their experience appropriately. Will every week of experience need to have utilized three steps of the planning process? For example, in one client engagement, a candidate may provide meaningful support in a single step of the process (e.g., plan implementation) without touching two additional steps. Would that count? If not, how would experience be credited fairly for those in specialized or entry-level roles? This could unintentionally limit otherwise qualified candidates and create more unnecessary barriers to entry. Financial planning is often dynamic, and an individual's role in a client engagement can vary widely. Many new professionals contribute meaningfully to the process but may focus on only one or two steps in a given engagement. Determining whether a candidate has met the three-step threshold would require subjective interpretation, making it difficult to standardize and enforce. The existing requirement ensures that initial certificants gain professional experience in the financial planning process, which supports their ability to provide unsupervised financial planning. The proposed change does not necessarily enhance the demonstration of competency but instead adds unnecessary complexity.
Hannah	Moore	
Kyle	Moore	So, if I understand their situation, help them identify goals, and analyze some alternative actions (without ever moving on to develop, present or implement) then I have met the experience requirements?
Callie	Morgan	I think it's important to have experience in all steps of the financial planning process, however this can be tough especially in an analyst type position. I strongly support at least having 3 of the 7 steps as this will ensure more experience with before providing unsupervised planning.
Scott	Morley	I believe that while more experience hours-wise isn't necessary, BETTER experience in that time frame would certainly help the profession.
Katrina	Morris	I think there is a big difference between someone who gets the letters to say they have the letters and someone who is committed to better serving their clients and community. By showing a proactive commitment to the financial planning process prior to earning this designation would, logically, indicate a desire to serve at the higher and deeper level.
Stephan	Morris	Should be all 7 but 3 is a good start.
Ben	Mossoney	Difficult to monitor

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

First name	Last name (c/o firm name, if applicable)	Response
Caden	Mumford	I have no problem with making sure that the CFP takes a well-rounded knowledge experience base needed to attain the marks.
Kahlala	Mungin	This is fine
Evan	Murphy	I believe some level of practical applicable experience is useful to candidates. It should not just be something that is learn in a book.
Jillian	Murray	In our evolving financial landscape, imposing greater limitations on the background of certificants will only make our profession more insular, less relevant, less cross-disciplinary, and less diverse on a number of axes. If anything, certificants with more diverse professional backgrounds are often more prepared to offer more complete and relevant financial advice than fresh faced recent graduates in their third year of answering phones. This move would dramatically limit the number of professionals in closely related and relevant fields who become certificants, because jobs directly in the industry that don't require the marks would also typically require those experts to take financial and professional backsteps. I think rather than increasing the caliber of candidate and quality of advice, this would actually disincentivize professionals in closely-related fields with a wealth of relevant experience from crossing over, and I would see that as a loss.
Lori	Nadglowski	Seems unnecessary
Maniganda prabhu	Natarajan	It is definitely r
Spiro	Natsis	Only oppose if candidates are not grandfathered in. I am personally like many others have completed the exam and have years of experience under the portal and would like it all to be grandfathered in since the proposal would go into effect after hours have already been approved by the board. Thank you
Toni	Navarre	Our roles in our clients' lives should always demand experienced professionals. We must be prepared to assist our clients in making decisions and/or changes in their financial lives that will benefit them and their dependents and their heirs. Please do NOT lower the CFP Designation requirements any further. The course work and the examination should be returned to the levels of knowledge, expertise and course work that were required when I took the CFP course at Rice University in Houston in 2006-2007. I passed the very rigorous CFP exam in 2007. Please do not sacrifice the financial lives of our clients on the altar of inclusivity. Please increase the CFP curriculum, coursework and examination requirements back to those I faced. Please return the CFP designation to the high mark of knowledge and skill it should and must be.
Gregory	Nebel	If one expects the CFP to truly function competently unsupervised, all seven steps should be required.
William	Nedza	While this change may have good intentions which I agree with, as I do believe the 'some professional experience in the personal financial planning process' is vague and quite easy to meet, how would a candidate show proof of having experience in at least three steps of the FP process, how would this be verified, and by whom?

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First name	Last name (c/o firm name, if applicable)	Response
Devin	Neitzel	Roles should involve a majority of the steps of the financial planning process, rather than only allowing experience that qualifies for just one. I could work in a specific role for my entire life and call myself a CFP yet do none of the other steps in the financial planning process (based on my understanding of the experience requirement).
Chris	Nelson	I support this because the current requirement is too vague. I do not strongly support this because I feel 3/7 is not strong enough. Why not 5? Why not 7?
Dennis	Nelson	Back to my comments previously. Holders of the CPA, PhD or JD distinctions can not be automatically assumed to have any of this experience in financial planning.
Jack	Nelson	Strengthens quality of future CFPs
Stacie	Nemetz	If the standard's purpose is to demonstrate ability to provide unsupervised financial planning, can that be done if a candidate does not demonstrate ability in all 7 standards? That said, proficiency in 3 out of 7 is better than no specific requirement.
Lucas	Nettles	Specific experience is a must. I think 5 of the seven steps would be better.
Jordan	Neuschwander	Financial professionals should be using all 7 steps and it's going to be difficult to track whether the specific three steps are being used.
Jeff	Nevlida	Need to keep ability to self-report experience for CFP without 'supervision'.
Jacob	Newcomb	Great addition.
Vu	Nguyen	Na
Santine	Ngwe	I think experience in all the 7 steps is too much to ask
Sara	Nicholson	I don't mind being more specific about the experience requirement, but I would want to make sure it doesn't create too much of a speedbump to young professionals who are trying to advance their skills. This is more of a which comes first issue - is a young professional able to get the opportunities to gain the required experience without the certification or do they need the certification to get a higher level or more specific level of experience? I don't have the answer to this, just posing the question.
Timothy	Nickas	I would recommend five of the seven.
Anthony	Nigro	I believe that even an entry level financial advisor should be at a minimum practicing at least 3 of the 7 steps to financial planning. It shows that you're on the right path to becoming a CFP. I'm not sure how they would demonstrate such though?
John	Northrop	I strongly agree with this but I think there may be difficulty in proving client interactions specific to the seven steps.
James	Norvell	I don't think the CFP needs to be watered down to allow someone to become a CFP that's not directly dealing with the public providing financial planning
Johnny	Nuanes	I believe there should be more options available for earning experience.
William	Oakland	Agreed
Bob	Obernesser	More steps are required to complete 'real' planning
Sean	Oday	I feel that experience in the industry is more important overall than the test itself. I do all of the financial planning without the designation because of the experience



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		of time in the industry, and studying the important topics that pertain to financial planning with my clients.
Ed	O'Hara	Too often, we see designations earned by individuals with little to no experience in the practical areas of the financial planning process.
Cherry	Ohms	No need to micromanage or box in the specific steps. Broad and diversified experiences often contribute to the level of depth and comprehensive understanding of client's unique situations and therefore help make more applicable and feasible recommendations in the financial planning process. For example, an unexperienced intern may be involved in three steps of the financial planning process, but a seasoned professionals who have many years of diverse experiences (but not necessarily in the specified 3 steps) would demonstrate far more capabilities in delivering unsupervised financial planning than interns who are involved in 3 steps.
Nathaniel	Oliphant	The experience should be highly regulated and monitored to assure the candidate has experienced a broad scope of client situations.
Robert	Oliver	This creates unnecessary complication.
Kelli	Olsheski	The plan matters the most. I support this focus.
Kyle	Olson	The experience reporting software is not user friendly enough to require users to list which parts of the financial process they are engaged in at all times. Specifically, in my job, the parts of the financial process that I engage in may vary day to day. I do not think it is reasonable to expect candidates to report their experience for each separate day and having to engage in at least three of the seven steps will make reporting more difficult for candidates.
John	Oluwaleye	The changes are intended to address criticisms that the current requirement could be fulfilled without much actual experience with financial planning. The CFP Board is seeking input from practitioners, candidates, firms, membership organizations, and the public.
Daniel	O'Mealey	How is the experience documented or verified?
Robert	ONeill	I think the amount of experience can be a good barometer, but hitting a certain number of criteria as well or instead of could also be sufficient.
John	Ortolf	CFP should have experience in the actual process
Andrew	Oster (Triton Financial Group Inc)	This dilutes the standard that communicates that professionals with minimum experience sit for the exam. A candidate that sits for the exam should have a more complete understanding of the planning process.
Stephen	Overstreet	Why is the Board proposing this change?
Olalani	Oyegbola	I do not believe some of the current paths to maintain a CFP certification require the usage of three or more steps of the financial planning process. For example, if someone assists with Tax preparation, that person may only perform step 6 (Implementing the Financial Planning Recommendations) by preparing the tax form. Similarly, this same scenario exists when someone just acquires an insurance product based on the request of a client due to another's recommendation. I do not believe the path to getting the cert should be made

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		harder. I do believe, however, the professional's experience and wise advice to a client can help shape what tax advantages exist and what insurance products provide the most equitable advantages, etc. depending on the service provided.
Lynne	Page	I think this opens the designation to people with specialized experience in a few areas and potentially waters down the designation for those of us who have practiced the entire process
Jason	Palmer	I agree that experience should be broad based across as many steps of the financial planning process as practicable and should allow for both flexibility and specialization. Three of seven seems a reasonable choice. What I do NOT agree with is why a CFP is required to have between 4,000 and 6,000 hours of planning experience? The CFP is a Certified Financial Planner by definition and NOT necessarily a 'Seller' of Financial Products nor an Investment Advisor/Manager. Again, predominantly Financial Planner for an Individual providing arms length fiduciary guidance on strategy and reaching goals. This seems excessive given that it exceeds the experience requirements duplicates or exceeds the experience requirements of actual 'Licensed' Professionals held to a significantly higher Government Regulatory Standard. I personally do not feel that one needs more than 500 to 1,000 of CFP experience to be competent - if no other prior experience. Specifically given that much of the Financial Planning Process is completely automated and relegated to Industry Standard software models. I would also like to see the Experience requirement and this rule completely waived for those that hold other educational waiver certifications, specifically the CPA or any other Government Licensed Credential that already has an experience requirement.
Jacob	Paltzer	Recently completed course work and the passing of the exams demonstrates that the CFP certificant is ready to begin providing financial planning services.
Asheesh	Pandey	Getting standard pathway experience is not easy for folks working in non-financial field. This will make it more difficult, nearly impossible to change profession and become CFP.
Jonathan	Panning	The experience needs to be comprehensive enough for the candidate to understand how the different parts of the planning process fit together.
Jonathan	Panzica	Experience required is vague and some entry level positions lack real experience that a CFP should have
John	Parrillo	Experience in the trenches matters
Nathan	Paschel	It's unclear as to exactly what would change. It seems there will still be a requirement for experience. 3 years in financial planning in most capacities will still satisfy the change.
Jeff	Pasternack	3/7 gives folks credit for what they have already done, and incentivizes them to continue to grow into the field
Jammy	Pate	Ensuring the core aspects is more professional
Christian	Patterson	I feel that 3/7 points is too few.
Jennifer	Patterson	For a planner to provide unsupervised financial planning they need to be able to demonstrate ability in more than one of the steps. I would like to see competency

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		standards be raised so that we more closely resemble a residency or other equivalent to medicine. The requirement for at least 3 of the 7 steps seems reasonable. I would not oppose a higher number.
Nathan	Paulson	This change would appear to reduce the standards for a designee. There is wisdom gained during the 2-3 year requirement which is typically viewed as apprenticeship experience and is valuable.
Adam	Peak	I see a lot of individuals pursue the CFP who are on their way to becoming very solid FP's in the industry. I think setting a base line is good knowing more experience and education is likely if they continue in the career path.
Jason	Peck	Experience matters less than desire to help and attaining the education/training needed.
Michael	Peczinka	professionals working in paraplanner/csa roles would be inhibited from using the marks. these individuals typically move on from service to sales in their business and anything that could prevent or delay their progress of being a practicing cfp should be avoided
Julia	Peloso-Barnes	In my opinion three steps is not adequate to demonstrate to the public the CFP® professional's ability to provide unsupervised financial planning. I believe the standard should be 'at least four steps of the financial planning process' before someone is considered able to provide unsupervised financial planning. This ensures that at initial certificants will have experience in at least two of the three steps that set CFP professionals apart from financial advisers. - Analyzing the client's current course of action and potential alternative course(s) of action - Developing the Financial Planning Recommendation(s) - Presenting the Financial Planning Recommendation(s) Someone who is not experienced in at least two of these three areas may be inadequately prepared to provide unsupervised financial planning
Danielle	Pennington	I think it is important that people have exposure to each of the seven steps before certification.
Judy	Perez	See previous statement.
Jessica	Perkins	As someone who engaged in the Accelerated Pathway under a CFP, I believe engaging in as many aspects of financial planning as possible during the experience portion.
Trent	Perry	I agree with the Experience requirement
Kris	Persinger	I feel passing the exam is proof enough to allow a certificant to practice
Laurie	Pertile	Agreed.
Kenneth	Peterson	The goal is laudable to ensure that the individual can demonstrate real life expertise in the process. However, different levels of clients require different levels of expertise and sometimes in differing areas (estate planning is more important to the HNW client than accumulating wealth as example). How might you address that?
Michael	Peterson	I see the merits of the proposal but also the drawbacks of having to be in the industry for some time before obtaining the designation.

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Zulma	Petty	With emphasis on steps 3, 4 & 7.
Cindy	Phelan	I think it is important to have first hand experience in financial planning. It makes sense to require this work experience for licensure.
Jim	Phillips	This makes sense to me. My experiences-related comment has to do with my inability to find work. I'm a career changer and passed the CFP exam a few years ago. I completed the coursework and the ethics requirement too. I have taken the externship for 3 summers (Hannah Moore) and that has gotten me some experience hours. But, at this juncture, I have not yet found a job. Please consider that ageism may play a factor in my situation and that perhaps there is something you can do for people in my situation. I don't offer any solutions here, but raise the issue to you so that you can address it in ways you think best. I do believe there are opportunities here to enable career changers and specifically older people to contribute and attain experience hours without it compromising the integrity of the designation. Thanks for considering my response.
Zach	Pidgeon	Could be difficult to judge but I agree
Robert	Pierce	3 seems low. Any 3 or a specific 3? More info would be needed.
Jennifer	Pietka	Can easily be used to let someone get by with experience
Susan	Pilon	I believe some experience requirement is good. I can see where some roles may not include all seven steps.
Daniel	Pinard	Experience in any single area of the financial planning process should qualify as meeting the experience requirement for the credential.
Natalie	Pine	This is a stronger expectation and allows for one trick ponies so not enter.
Linda Sue	Placek	Its a good start.
Matthew	Platt	Having experience in at least some of the steps of the planning process is necessary.
Timothy	Plonski	In my opinion, steps to reduce or lighten the experience requirement are a disservice to the public. The CFP designation is viewed as the 'gold standard' in the financial planning industry, and requirements for obtaining the designation should remain rigorous. While I understand lessening the experience requirement will increase access to the CFP designation for many, I do not see how the proposed modification is in the best interest of the public.
Kevin	Podell	I believe that experience in financial planning is critical to ensuring that CFP(R) professionals are able maintain the standards expected by the financial services community. There is no substitute for this experience.
James	Pontious	You learn by doing. This is not rocket science
Bruce	Popper	Seems to me this would require potential candidates to be more well-rounded in their scope.
James	Powell	This is a good and needed clarification.
John	Power	Stronger development process than simply doing something in a financial services company.

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Hunter	Prasch	This seems like it would hinder career switchers that aren't necessarily in the career of financial planning, but want to be. If the goal is to have more CFP professionals, this may hinder that goal.
Darwin	Pressley	The more experience with the planning process is only going to help the foundation of a CFP professional.
Jacqueline	Price	I agree with this change. Having more specific requirements for experience is a positive thing for anyone pursuing the CFP.
Jeffery	Price	this sounds reasonable
Robert	Pryor	Too restrictive.
Jeff	Puissant	Is this considered more restrictive or less?
Bryan	Purdum	It's probably good to make sure that experience is not just in one area.
Melissa	Pyle	Absolutely. RELEVANT experience hours are important.
Cassandra	Queen	This will elevate the level of professionals representing the CFP as they are first starting out as a CFP. It is my strong opinion that experiencing all seven steps of the planning process allows planners who are mostly administrative to understand the relationship dynamic of the clientele they are providing.
Paola	Quintero Salazar	The new rule could make it more challenging for CFP candidates to find jobs that expose them to at least three of the seven required areas, potentially delaying their path to certification. Many entry-level roles involve administrative or assistant work, which, while not directly delivering advice, still offer valuable exposure to the profession. Additionally, roles in financial coaching or financial education often help candidates gain relevant experience. However, with this change, it may become harder for certain types of experience to qualify, narrowing the scope of acceptable work and making the experience requirements overly specific.
Kevin	Rackers	As long as it doesn't make you have 5+ years of each of the 3/7 steps, that would be fine I think.
Christopher	Rakow	Don't Waterdown the designation
Dana	Randall	In my personal opinion, we have high standards for CFP. Changing requirements, just to be changing something, is that needed?
David	Raney	I think it's important.
Lawrence	Ransom	How do we document and define this? That would be my only concern with such a rule.
Alan	Ray	Not three steps. Two competency areas from this list: Risk Management/Insurance Planning, Investment Management for Accumulation, Cash Flow or Distribution Planning for Retirement, Interviewing and Client Communication, and Financial Product Due Diligence. Mastery should not be required. But meaningful engagement should be demonstrated. Each candidate would be evaluated individually; not filtered by specific hurdles. Experienced CFPs could volunteer to interview candidates and document the substance of experience.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

First name	Last name (c/o firm name, if applicable)	Response
Robert	Reay	I believe all candidates should have a minimum level of relevant experience in order to sit for the CFP exam.
Michelle	Redding	I think experience is very important in the steps.
Alyssa	Reed	I oppose this because I believe the knowledge base on the exam demonstrates competency in all areas of financial planning. However, some prefer to specialize in one particular aspect, and their experience reflects that. Having experience in three of the seven areas does not really add value considering the exam tests in all. Rather, it inhibits those who wish to become experts in one area after/before demonstrating overarching competency on the exam.
Bryan	Regalado	The path to CFP is already difficult, more red tape would not be helpful.
Lora	Reinholz	Overall, it makes sense that experience in multiple steps is included, how will this be verified?
Daniel	Rendler	Again this should not be a designation that people can collect. It must be earned.
Kelly	Renner	Especially if they will be a practicing CFP Professional, it is important to have an understanding of the planning topics
Chad	Reynolds	real life experience is a must to apply coursework
Jacob	Rhodes	Strongly oppose
Chris	Richie	Why not have a CFP who will often need to teach, instruct, advise in all 7 areas be able to do that?
Loredana	Rickard	I support this proposed change.
Mark	Ricklefs	Other experience should be considered
Zach	Riffett	I like the current experience standard as is because I dont want to water down the designation.
Jonathan	Ritter	I do not believe this will make any impact in producing higher quality professionals.
Matthew	Robb	That is not enough steps to be well prepared to be a CFP.
Dwightq	Roberson	Agree. It should cover aspects of the seven steps covered in the CFP program. If not, why teach it?
Finley	Robinson	this needs more clarification. will required experience be needed before even sitting for the CFP exam or is this a post exam requirement?
Jody	Robinson	That's too confusing. Which three steps? How does it apply?
Thomas	Robinson	In other to earn the CFP designation your practice experience should encompass multiple steps in the financial planning process.
Blake	Robson	I oppose as I strongly believe you should have experience/competence in the planning process. Otherwise, a the risk of devaluing experience increases.
Dylan	Roche	Seems to create a too-specific requirement for a standard which is meant to show general competency rather than one-for-one adherence to the CFP model. Worried about it leading to confusion, or the need to shoe-horn specific types of experience into this requirement.
Nathan	Rockholm	If the CFP is going to be THE designation then we need to make it more difficult to get.

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# CFP BOARD

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Rob	Roels	If the goal is to demonstrate 'unsupervised' financial planning only have direct, real-world experience in 3 of the 7 steps is not sufficient.
Michael	Rois	I have not gotten to work with these individuals before to see their competency but if they do cover enough of the planning courses with what they have already done, it could be a decent addition to people to be encouraged the get the designation.
Jason	Romano	Current standard seems very appropriate.
Richard	Rosso	I agree with this change.
David	Rowland	We should not water down our standards. This is important for public trust and for better outcomes for our clients.
Marsha	Rubin	Gives a stronger base of experience.
Patricia Ann	Rudy-Baese	Waters down the experience necessary.
Victor	Ruiz	There should be some level of experience related to the financial planning process, as the individual obtaining the CFP designation would be deemed a 'Certified Financial Planner.' If they have no experience with financial planning and the process, why should they be considered certified? The current requirement of 6000 hours of experience is sufficient, as this amounts to ~3 years; however, the inclusion of addressing at least 3 of the 7 financial planning steps along the way is a more than fair request. Realistically, candidates should have experience with all of the steps, at some point in their career, or they may need to hold off on being awarded their CFP designation.
Michael	Rundlett	I don't know what the current standard of 'some professional experience' really means - is the assumption the experience includes all phases of the process? I'm not sure including 3 of 7 steps indicates a greater proficiency or better experience or not. I think certification should require experience in all seven steps at some point. Or something close.
Jonathan	Russell	If an individual is focused on a specific segment of the financial planning process and they have the requisite amount of experienced, I don't feel they should be penalized for specializing.
Chris	Russo	I feel there is no need to change this standard. We already have an experience requirement that seems to be working.
Gary	Rychtanek	This also waters down the CFP as all aspects are important and should be required. Financial planning is a comprehensive process.
Amanda	Rysiewicz	Some positions might not offer that type of experience, we wouldn't want someone to have to change jobs to get certified if it was the right path for them
Joseph	Sachetta	I believe that experience is an important part of the certification process.
Siegfried	Saftner	It makes sense that the candidate should be consistently practicing at least part of the financial planning process as a regular part of their job to satisfy the experience requirement
Brady	Sahnow	I think some level of having experience and a 'foot in the door' of the career makes sense before giving the designation.
Dennis	Sakurai	Why not all seven steps? I want to make sure we hold each other at high standards.

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Melissa	Sanchez	This is not specific enough regarding what you mean by 'experience'.
Seth	Sartain	If understand the intent of the change, I agree. My understanding is that the Standard Pathway should include more actual planning, more akin to the types of activities required under the Apprenticeship Pathway.
Laura	Satin	There is so much to know, and the consequences for giving bad advice are potentially catastrophic for clients.
Paige	Scannapieco	I believe it is extremely important to have the experience in the financial planning process be being able to hold the designation
Rob	Schaefer	The more practitioners we have vs 'test passers' the better our reputation will remain. The practical experience goes a long way to ensuring that.
Charles	Schilleci	Eliminates individuals that work only in insurance, law, investments, or tax prep, to qualify. As financial planners, we need to be well versed in all areas, even though we may specialize in one.
Margery	Schiller	Personal financial planning is very different from business financial planning and should be respected as such.
Gabriel	Schindler	They may not work with or have learned from someone using the financial planning steps, this could require people with years of experience to start at 0 when going through the process, disheartening candidates.
Erika	Schleifman	No opinion
Joy	Schlie	A base level of knowlege in multiple areas is relevant and demonstrates experience.
Jacquelyn	Schmidt	Experience is important
William	Schretter	We want a person who is holding themselves out to the public as a CFP to have the needed education and experience to be competent according to our professional requirements. Experience in asking questions, running a meeting and planning project, and completing the analysis is all essential. It needs to be done according to the standards in an unsupervised independent manner.
Nichole	Schurr	There does not appear to be evidence that 'some professional experience' in the personal financial planning process and requiring that a candidate have experience addressing 'at least three of the seven steps' of the financial planning process will provide any benefits to the public or enhance the CFP marks. This change would likely cause more confusion than clarity.
Adam	Schwartz	Should this be required, please do not then require satisfying specified CE making the process more complex with all the other CE that is required from different certifications.
Clinton	Seefeldt	I would want to see how we define experience in the seven steps of the financial planning process. For example, for the fourth step (Developing the Financial Planning Recommendations), I'd want to make sure the recommendations were good recommendations, and not just, 'I recommend this annuity.' I'd want to see them expand on that showing they analyzed multiple options and settled on a specific one that achieved all the client's goals.

# CFP BOARD

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Alec	Sessing	This seems unnecessary because if you are working as fiduciary you should be working in all those areas anyway for every client to gain the experience and after one earns the marks
Byrke	Sestok	The CFP Board already mints new certificants in volume that do not practice financial planning. I know the CFP Board wants to keep making more money and raising the number of CFPs but making it even easier to use the marks without actually practicing financial planning is counterproductive to our profession.
Viney	Sethy	This proposal is vague. Which three steps? In my opinion, of the three steps - the development of financial planning recommendations experience should be a prerequisite for initial certificants.
Renee	Sewall	Good to have broad experience before holding out as a CFP
William	Shafransky	There should be no exceptions made. Either you follow the 7 steps or you don't. You're either a CFP professional or you're not.
Amy	Sharp	Practical application is one of the best ways to learn.
Cameron	Sharpe	Practical practice is beneficial. Learning is different from doing so I think that is a good idea. However, some people may struggle to get practical experience and there will be differing levels of it which might make that specific change be less impactful.
Gary	Sheller	I feel this demonstrates that the person representing themselves as a CFP has actually done the 'work'. Often it seems that people have obtained the designation as a pursuit of getting a salary increase from their employer, (like working at a bank), rather than actually providing planning services.
Jeff	Sherman	I think it's important that a CFP practitioner have some actual experience in the field before they can hold the certification.
Mark	Sherno	Makes sense if the candidate is going to be providing comprehensive planning
Daniel	Shevlin	You can't replace experience
Matthew	Shirley	I think the current experience standard is sufficient. I devalues the CFP mark if you make the experience standard less than what is current.
James	Short	I support a simple experience pathway- very similar to the CFA designation.
Tyler	Simonds	I believe this to be crucial in having proper experience and provide financial planning
Ardarius	Singleton	N/a
Alisa	Skatrud	My technically non-qualifying investment experience is significantly more relevant to what I do every day versus the experience that I listed and used to qualify - that needs to change. The current standard leaves many people out of the CFP experience that are immensely qualified to work in the field, and I support efforts to fix this misalignment.
Joy	Slabaugh	This ensures people who use the marks have adequate experience
Austin	Smith	Not all specific job titles entail all 7 components of the financial planning process. I think 3 of the components makes more sense.
Brian	Smith	Given the language in the current standard, it is hard to tell how the proposed standard would strengthen or weaken the competency standards. At a time when

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# CFP BOARD

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		the CFP Board is investing more money into brand awareness than ever before, and exam registrations are at all-time highs, I am strongly against anything that diminishes the value of the certification (which is unavoidable as you remove barriers to entry). Anything else can only be construed as a money grab by the Board.
James	Smith	Seems obvious
Roger	Smith	None
Ryan	Smith	I think you should have experience with all of the steps
Scott	Smith	I feel the current experience requirement is too wide in scope to include experience that does not reflect any experience in financial planning so this change is long overdue.
Ted	Snow	I think that many people who start in the financial services industry are focused on one or two things - to require three is a big stretch. I think that the professional can acquire the other skills and experience in other settings and opportunities.
Hamilton	Soriano	Strongly support
Fred	Soule	The CFP should have very relative experience
Albert	Stanton	I believe that professional experience is helpful as it can apply knowledge to real life situations/experiences that the candidates have gone through.
Colin	Starr	3 of the 7 means they haven't experienced half of a financial advisor or planner. Only doing investment work or only doing case consulting work doesn't constitute all the disciplines required for competency
Jael	Stebbins	Financial planning is a structured process and should require specifics in order to count toward the experience. Just providing financial/investment guidance does not necessarily lead to wholistic financial health.
Adam	Stempel	There is already limited to no follow through on the hour requirement. Anyone actively engaged in financial planning as currently described will by necessity engage in at least 3 of 7 steps of the process. This adds complication without any tangible benefit, and presumably no enforcement follow through.
Laura	Stern	this requirement could be difficult to track and implement. Making a judgement about whether a job included three steps would be complicated and not add much to the candidate's preparation.
Andy	Stevens	Please see previous section comments.
Deann	Stevens	I think the current standard is fine. The whole purpose of the certification is to show a level of expertise that the public can rely on. The current standard is neither too onerous or too simple. It's just right.
Matthew	Stewart	It should be all 7 steps, in my opinion. After all this is a financial planning certification where the 7 steps are paramount to the entire process. They should have some practical real-world experience in working with clients through all 7 steps.
Scott	Stewart	This is a joke to include or not include. There is 0 way for you to actually enforce this so it's of no consequence to anyone, even if on the surface it seems like it's in alignment with the profession.

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# CFP BOARD

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Jennifer	Stipick	I think more of the steps should be covered in experience.
Amber	Stoll	Financial planning isn't something you can do in bits and pieces and certainly not just in three steps. Letting candidates meet the experience requirement by covering just three steps takes away from the well-rounded expertise that makes CFP® certification so valuable.
Eric	Strom	Yes, I support this. I've seen experience that to me is too limited.
Bryan	Strong	I think having previous experience with at least 3 of the 7 steps is very important to becoming a CFP & servicing clients
Cherie	Stuece	Yes, I agree. Similar to the CPA requiring multi-disciplined experience, having experience in multiple steps is also crucial to hold the marks. Different client experiences with CFP(R) professionals with very niche experiences have indicated how less-than-comprehensive their advice of the whole person across multiple steps and areas of knowledge.
Monica	Sullivan	This would hurt those who work in another's practice or home office as staff support.
Alex	Sutherland	The CFP Certification should never be allowed to become wall foliage. I.e. it means something in the marketplace now and should mean something in the future. To allow any/every investment manager or tax professional that wants to convince people they can charge for planning to obtain it with no relevant experience, I would also oppose that.
Charles	Swanson	The current experience requirement discourages many, who are qualified to sit for the CFP exam, from doing so. Some have extensive and deep experience in a wide range of financial disciplines, but don't meet the current and rather restrictive experience requirement—so they move on without taking the CFP exam and obtaining CFP certification.
Anastasia	Taber	I also support the CFP Board promoting and encouraging more and more opportunities for those who do not already work in the industry to gain experience.
Jason	Tafoya	It seems like there should be proven experience in more than three.
Julie	Takkunen	I have been licensed for almost 6 years and am just now a candidate for CFP. I keep saying that a lot of this information would have been extremely helpful to me in the past 6 years and I wish I could have studied and taken the test BEFORE getting licensed or immediately after. I do not understand why the information has to be such a secret society. The information is very difficult to acquire unless you pay thousands of dollars to purchase a course.
John	Talleur	Seems to make sense requiring some experience in a para-planner role. For example, many people carry the CFP Designation but do not actually practice Financial Planning.
Landon	Tan	I'm not sure how many it was before.
Christopher	Tarashuk	It could be 4 or 5 as many steps are closely related. Even including step 1 must be demonstrated could be an excellent requirement. It is the base of our planning and if a CFP professional can not understand a client's position, how can they determine what appropriate and realistic goals, investments, or implementation would be?

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First name	Last name (c/o firm name, if applicable)	Response
Christopher	Tasik	At a minimum
J Lawrence	Taunt	If they are going to be a 'Certified' financial planner they should have experience with the entire process not three of seven
J Lawrence	Taunt	Three is not enough, you be at least 4 of the seven steps
Kriti	Tawfik	I think time in the industry and experience is unmatched, especially when assessing a professional's ability to provide financial planning unsupervised. However, since there is such a heavy emphasis on the steps of financial planning, the proposed change certainly makes sense to include as a requirement.
Don	Taylor	The change ensures that the certificant isn't a 'one trick pony' and has some depth of experience that addresses at least three of the seven financial planning process steps.
Josh	Taylor	Be careful not to make the bar so high you discourage people.
Kevin	Taylor	Modifying the Standard Pathway to require experience that addresses at least three of the seven steps of the financial planning process would enhance the practical readiness and expertise of candidates entering the field. By engaging in multiple key steps—such as understanding client goals, developing recommendations, and implementing financial plans—candidates will gain a more comprehensive and hands-on understanding of how to deliver effective and personalized advice. This requirement ensures that professionals are not only academically prepared but also capable of applying their knowledge in real-world scenarios. It promotes the development of critical skills in areas like client communication, analytical problem-solving, and plan execution, which are essential for fostering trust and delivering meaningful outcomes for clients. Ultimately, this modification strengthens the pathway by better aligning it with the practical demands of the financial planning profession.
Travis	Taylor	I spent the first decade of my career in management roles at WFA. Eventually became a Managing Director before I transitioned into a producing role. That decade of management experience did NOT prepare me to be a CFP. The standard pathway should include all steps of the financial planning process.
Travis	Taylor	I support this aim, although have some concerns about this portion of the requirements becoming a hindrance to people practicing as CFPs who otherwise passed the exam and did the academic coursework. I wouldn't want this to become a hindrance where 'work experience is required to get the entry level positions' thereby creating an unnecessary barrier to entry into the profession. If there are certain experience requirements that the CFP Board feels are simply inadequate, I would rather we simply state that, rather than changing our rules to something more vague that could inadvertently hold others back.
Victor	Tedesco	Need some experience
Douglas	Tees	Deep focus in one area is great, but the marks communicate broad understanding of the 7 steps.
Alexander	Theodore	I believe the current standard is sufficient for certification. However, I would not be opposed to the proposed change.

First name	Last name (c/o firm name, if applicable)	Response
Andrew	Thibeault	this seems like your broadening the scope and making it easier. only three of the seven, so they could have no experience in the other seven and still satisfy the standard?
John	Thomas	Doesn't materially improve to segment and require demonstrating work in a lot of sub categories.
Karrie	Thomas	The professional experience incorporating at least 3 (or more) steps in the financial planning process will only benefit the certificants and profession as a whole.
Gay	Thompson	I believe this is watering down the standard, which is already easy to meet.
Mark	Thompson	I prefer that those holding the designation apply that knowledge in their practice, not just theoretical.
Jamie	Thuss	This more clearly defines the related experience of the professional and is not simply a subjective measure.
Andrew	Tipton	It's difficult enough to get into the industry and obtain your CFP Certification.
Adam	Tobin	I strongly support expanding the professional experience portion to allow for extended work or experience in the profession to go towards candidacy.
Isaac	Towne	Every CFP develops a financial plan differently. I agree this is a good compromise
Lynn	Tramontano	This just helps in so many ways.
Lee	Trevino	I believe you should work in the industry as a financial advisor before trying to get your CFP. We shouldn't have individuals who are working a very entry level in the industry going straight into the CFP without sufficient experience.
Patrick	Trimp	3 years working in the field as an actual financial advisor is more than adequate. If you continue to become more restrictive and bureaucratic in your 'rule making' process, you will start losing credibility with those of us in the field that actually do the job.
Cary	Tucker	Generally, I would support the use of prior certifications and designations to reduce the education requirements. I have no objections if a financial professional in a slightly different field, such as a CPA, would be able to waive one or more of the usual coursework requirements for the CFP® (based on prior education and training). However, I am opposed to individuals who seek credit towards the Standard Pathway experience requirements for having worked in finance before but whose only experience is well outside of personal financial planning. I have to question, for example, if someone with an MBA degree should be able to use any of their experience in business and corporate management (e.g., as a CFO) towards the experience requirements to become a CFP®. I do not have a strong opinion, nor do I believe that I am qualified to comment, as to whether the experience requirement should address two steps, or three steps, or four steps, etc. I am in favor of the idea though for setting more specific standards or more detailed requirements that the applicable experience must include application of the personal financial planning process (and not be solely or largely in other financial processes such as preparing business plans for a corporation or completing tax returns for an industrial partnership).

# CFP BOARD

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VesnaAnn	Tucker	They need to have experience in the field.
Jeffret	Tudas	Experience along with the book learning is extremely important.
Nicholas	Tupaj	I support this proposal as those who wish to move on to do their own advising will need to showcase real-life competency in the process steps. My only reservation being: how does the Board intend to ensure that experience is met and competency is displayed? The exam and attestations can only carry you so far.
Halle	Turner	Too many barriers to entry for a candidate could mean less candidates in particular those of color in wanting to pursue this pathway.
Rob	Typher	I already stated this in an earlier question, but here is my response: I grow increasingly concerned about the the large number of hours (either 4,000 or 6,000 hours) a CFP candidate must complete, specifically in the financial related field, in order to become a CFP. Sure, if someone is in the early stages of their career, this requirement seems reasonable since they likely don't have large financial obligations yet (although many do have to payoff educational loans, pay high rent, and significant insurance costs). But what about those who want to change careers later on in life? At that point in life they likely have a mortgage payment, and a family to support, possibly supporting their parents, may still have school loans, etc. Because of these financial demands, they can't afford to take an entry level job in the financial area to gain the required experience. Additionally, just because they have no experience working in the financial industry doesn't mean they haven't gained a lot valuable skills over their career that can apply to financial planning. I can speak of my own experience where, before I started practicing financial planning, I was in several different fields where I interacted face-to-face with business clients, had to make presentations, and provide financial analysis. Certainly those are very valuable skills that can be applied towards a financial planning career. Not to count any of that as viable work experience doesn't seem right. To me, if a person has 10+ years of fulltime work experience, even if it is not directly related to personal finances, and has a 4-year bachelor's degree, that should be enough experience. Again, we are talking about what is a practical solution, not what the ideal solution is.
Joseph	Ullrich	I believe that codifying what counts as relevant experience is a good thing, as 'working for a financial firm' can be too broadly interpreted.
Inderdeep Singh	Uppal	Its imperative to have all the steps to be followed to get all goals
Angelo	Vacirca	This helps credentialize the letters more instead of focusing on one topic area like insurance/annuities.
Andrea	Vaioli	I would add a requirement that they function in an apprenticeship type of role similar to that of a CPA requirement.
Paul	Valentine	I understand why they are doing this, but if I understand this correctly, it would not allow new advisors to be able to do the CFP early in their career. I am trying to do it now after having built my business, and it's a tough task to do that along with all the other work I am doing. I would like to be able to hire new young advisors onto the team, and have them focus fully on the CFP first, and then after that start to build the business.

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Adam	Van Deusen	While I appreciate the desire to make the Experience requirement more rigorous, I think it exacerbates the challenges for career changers considering a financial planning career and CFP certification. Whereas recent college graduates are more easily able to accept the relatively low pay that comes with entry-level positions at financial planning firms, doing so for a mid-career professional is much more challenging (given likely family and other financial responsibilities). Without the ability to apply experience that was not performed directly in a financial planning firm (as the proposed change would eliminate most 'indirect support' options), mid-career professionals would have to find one of a limited pool of full-time positions (or pro bono opportunities) that don't require CFP certification. I would like to see a special path to the Experience requirement for mid-career professionals (who can demonstrate workplace professionalism skills that new college graduates need to learn on the job), perhaps one that entails completion of an intensive in client-facing work (perhaps similar to the FPA Residency?), which would allow them to fulfill the requirement (and demonstrate their ability to work with clients!) without having to spend multiple years in a low-paying (and perhaps largely behind-the-scenes) position with a firm (particularly because they would already have demonstrated their technical knowledge through the Education and Exam requirements). This would have the benefit of encouraging more mid-career professionals to pursue a career in financial planning and CFP certification while ensuring they have the skills necessary to do so.
Brendan	Van Egeren	I believe this is a strong requirement and aimed towards those who can utilize the CFP to make a difference in the lives of others.
Neal	Van Zutphen	Any 3 of the subject matter? Which 3? Seems this needs better definition.
Hannah	Varnado	I think it is important that applicants have experience in more than one category because financial planning should be comprehensive
Cristal	Vernon	No opinion
Andrew	Vidal	These specific requirements better communicate the skills and experience that all CFP professionals have.
Gregory	Virant	Unsure how this could be enforced (supervisor sign off?) but I think it's worthwhile to have candidates actively involved in a few steps of the process.
Solon	Vlasto	I strongly support this change. I believe there is an option where required hours can be met in just one of the seven steps of the financial process. This is not diversified enough and I think the definition may get stretched on certain particular steps. Therefore some candidates earn the marks where I would not be comfortable considering them as an independent planner or having them work unsupervised. I would like to see the requirement include 4 steps actually.
Garrett	Von Behren	I think this additional clarification will help those that struggle to earn the CFP because they only have professional experience in say the insurance industry.
David	Voth	I believe that the existing standard is stringent enough.
Kyle	Walchli	This seems like a good idea but probably a little over kill!

First name	Last name (c/o firm name, if applicable)	Response
Bryce	Wallace	Is there any thoughts of if someone meets 6 out of the 7 experience, they would still be on the standard plan. Would the board look to reduce the amount of experience based of how many of the 7 requirements are met?
Ethan	Wallace	I support this and would like to see experience actually coming from financial planning vs insurance sales, etc. However, I am concerned that this will be hard to measure and if there isn't a good process for new metric I don't think it will drive the change that is desired.
Zach	Wallace	No comment
Jennefer	Walsh	I would select Strongly Support, but I'd imagine that there are exceptions that I don't know about that could sway my opinion, so I selected Support.
Brandon	Walters	I believe the experience standard of all seven steps is reasonable to be able to demonstrate.
Lori	Walters	This is especially helpful for those early in their career or newer to the industry.
Cody	Ward	Emphasis, if any at all, should be on the first step — Understanding. The better the understanding, the better the engagement. Personally, I feel it's especially important that the consumer of financial planning services *feels* like their circumstances have been understood. Who takes advice from anyone when there is doubt that the circumstances in question are understood?
Victoria	Ward	Having experience in the financial planning process will better equip the CFP candidate
Thomas	Watson	If you don't have experience in at least 3 of the 7 steps of financial planning, you have no business being a CFP professional
Saviez	Wazir	Not really sure to be honest.
Rhonada	Weaver	Adding yet another layer to obtain the CFP just makes it less appealing to anyone wanting to obtain.
Coleman	Webb	I'd need to see examples of experience that satisfies the CFP board's steps before supporting this experience standard.
Dianne	Webb	why only 3.... again, why dilute what the rest of us have worked so hard to learn.
James	Webb	I am for raising the experience standard.
Lisa	Webb	What is the justification for the change? What is the point of having seven steps in the financial planning process but only require three be completed to considered experience?
Jeffrey	Weeks	This proposal unnecessarily complicates the qualification process and adds no value to the candidate, the industry, or the consumer.
Curt	Weil	This change ensures that experience reported covers more than only one element of financial planning.
Mark	Wells	I think a CFP needs experience.
Jerome	Wenner	Terrible question to ask. Again. Don't lower the standard. Regardless of affiliation, it is not in the publics best interest. Ethics, ethics, ethics. Actions speak louder than words. Always. Maintain the Highest Standards.
Katherena	Weyand	In my opinion, the ability to successfully perform the final three steps of the financial planning process is instrumental to one's success as a financial planner,

# CFP BOARD

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		and therefore should be required as part of the experience requirement. Having experience in those three steps would help better prepare CFP® professionals to provide independent and highly competent financial planning services to clients.
Jensen	Weynands	This is a nice way to be sure that a person's work experience is eligible and relevant. I just hope it won't make any great candidates ineligible purely because of the type of work they've landed. Truthfully, it can be a little more difficult to find work related to financial planning if you have yet to earn the CFP designation.
Brian	Whatley	I believe requiring experience is important because too many financial designations are available to people with no experience, training, or ethical expectations.
Jack	Wheeler	Experience is an extremely key part of applying your education from the CFP. Requiring experience in only 3 of the 7 steps seems to be lowering the standards of what the CFP asks for. I get you're trying to bring in more CFPs by doing so, but that directly hurts the marks as well, and makes them less prestigious
Lanita	Wheetley	Too many individuals get their CFP® designation for marketing purposes only, and I've known lots of CFP® certificants who do not engage in financial planning more than 5-10% of their time if the client specifically asks for it. If CFP® certificants aren't spending 80-90% of their time engaging in financial planning services, including but not limited to creating plans or meeting with clients to review their plan, they shouldn't be allowed to use the mark.
Gaius	Whitfield	As mentioned elsewhere, I am not in support of making it easier to obtain the designation. By permitting experience in three of the seven planning steps, I feel that candidates will not have the requisite experience and capabilities of existing CFP designees. The board should maintain the existing requirements as they are not onerous and as they ensure competent CFP members.
David	Wiedmeyer	The requirement needs to have some proof. The honor system dilutes the experience requirement.
Tyler	Wiegert	Finishing the CFP certification requires a broad knowledge set and the ability to integrate that knowledge. I don't believe a person can achieve the designation without actually working in a job that makes them holistically plan on a regular basis, so adding language to require that your work covers at least three areas of competency seems redundant and unnecessary, but I don't think it's going to hurt anyone.
Ronald	Williams	Certificants should be working in more than 3 of the 7 to count as professional experience
Jacqueline	Willilams	Prior to formulating an opinion about the proposed change to the current standard for experience, I think it is important for you to educate the public on the 'seven steps of the financial planning process' that you are referencing in this statement. I searched your website for more details and only saw five (5) steps.
Roger	Wilson	I like the idea
Geoffrey	Wilwerding	3 of 7 is fine. i will say this now and further down on other questions. you ned to have CFP carriers do a self video at least yearly on a planning presentation they did and submit that to CFP land.

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First name	Last name (c/o firm name, if applicable)	Response
Mary	Winand	I think having experience in the entire personal financial planning process allows for a more rounded financial professional. Clients are starting to rely on us more and more and having limited experience is setting up CFPs for failure.
Alexander	Winstead	That is too limit-ing to the industry, and could hurt the amount of individuals who seek out the designation
Amanda	Wiscomb	i think if you dont have one of the three it will significantly increase the time it takes to become a CFP. i think this may deter or alienate some individuals who havent had the exact career pathing.
Todd	Wnuk	Standard pathways should cover all the steps. The Board needs to stop watering down the requirements to gain more certificants.
James	Wood	Pros and Cons of this might be helpful. In general it sounds like more red tape that people will find ways to get around
Christopher	Woodard	I think this important to uphold the CFP designation as a reputable one.
Loryn	Woodard	If it is to add more experience to the pathway, I think that is a necessary requirement to obtain a CFP. Especially if you are self practicing. I my CFP class now I have a medical diagnostician, an engineer, a business school graduate...As a financial advisor none of these people know that stress and care required to understand a holistic financial plan. I have come across so many scenarios between estates, trusts, business plans and it has been helpful in my CFP journey and I know how to better apply my skillset. I think it is different if you have less exposure or little to none. Experience should be required and I think 3 years is too little we should increase it to 4 years.
Mike	Woodham	When you add background experience such as this you are weeding out many highly qualified candidates who simply cannot find an avenue to gain that experience. Rather, I believe the CFP board should seek to offer an alternative such as increased educational course work that deals with practical application, real world examples, and ask the candidate to complete that curriculum before or after completing the CFP certification course, and a prerequisite for final award of the CFP designation. We should be seeking to enlarge the pool of participants who seek the CFP mark. Having undue restraints is a hindrance to this.
Leah	Woodly	Experience is necessary and the broader experience a candidate can obtain, the better.
Mark	Woodruff	Experience adds credibility to the certification.
Laura	Woods	Who determines and how could it be determined that the individual actually has experience in three areas of financial planning before labeled a professional that can provide financial planning unsupervised? A worthy idea but this would make things more complicated than necessary.
Laurence	Wulker	You are back to not learning anything - just doing it to avoid being thrown out.
Elissa	Wurf	It makes sense to have some breadth of experience. I was a CPA before moving into wealth management and focusing on tax planning rather than tax preparation and getting the CFP, and I really needed experience in areas other than tax to best serve my clients.

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Jeffrey	Yeakle	This change is unnecessary, most young planners do not start out independently. They typically are part of a larger organization and are supervised. This change makes it harder to gain entry.
Stephen	Yoskowitz	Giving flexibility to provide prospective CFP® candidates the ability to demonstrate their proficiencies through multiple avenues is simply recognizing the myriad of backgrounds from which CFP®s may arrive in their current positions.
Machaka	Young	No further comment
David	Younis	If the goal is to improve public trust, why would you reduce the level of experience or direct interaction with all elements of financial planning?
Z	Z	The barrier to entry because of the 'experience hours' is an issue to be solved not raised. A college student can take all necessary course work pass the CFP but they are still not even close. If you want young professionals make it possible to be a young professional.
Ian Zabel	Zabel	from what I'm reading, this will make it more difficult and exclude more experience from qualifying. I do not think this is a good thing as a 38 year old sector changer. I have presented in front of executive c suite. And other customers who relied on my financial analysis and planning after listening to their needs and reading their product briefs, not everybody can fit and grow up along that traditional cookie cutter framework in fact it, it brings less diversity experience to the field.
Erica	Zacharie	Cautiously support. I do think this will encourage more firms to abuse 'internships' and avoid actually hiring CFPs.
Daria	Zalewska	Yes, I totally agree with this. The current standard is vague and very subjective. Almost anything could count as personal financial planning process such as working in a bank or being a customer service associate in a financial planning firm. This solidifies the requirement that the experience has to be within the planning process. A paraplanner would be a perfect example in being able to obtain this experience.
Mark	Zeigler	I'm coming from a background not in financial services and trying to be a career changer. I think I'll hit at least 3 of the 7 steps in my experience, but I'm not for making entering the career more difficult. I don't think anyone going to a CFP is asking themselves if their CFP has experience in at least 3 of the 7 steps.
Nancy	Zhai	Requiring 3 elements for standard pathway will make it longer for younger professionals to achieve competency
Jennifer	Ziegler	I do think this credential is desirable and a hallmark of our industry. I do believe experience is a criteria that should be upheld and client facing individuals should be expected to perform these steps in their daily behaviors in the workplace to hold the credential.
William		Please do not make things harder just for the sake of making things harder. The current standard is good enough.
E	A	Why not more?