

**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:**

***Allow candidates to report and accumulate a maximum of 500 hours of Pro Bono experience toward the 6000-hour requirement of the Standard Pathway.***

First name	Last name (c/o firm name, if applicable)	Response
Laura	Abbott DeCarolis	the experience on might gain working pro bono should be no different than the experience gain by being paid
Hamid	Abdollahi	Throughout my banking career, spanning from 1992, my salary has consistently ranged from \$30,000 to \$50,000. Despite consistently providing pro bono work, I have never had the opportunity to work with high-net-worth clients. While employed at Sovereign Bank(1997 to 2009), I was repeatedly denied sponsorship to obtain my securities licenses in Boston. Frustrated, I left and joined TD Bank, hoping that TD Ameritrade would sponsor me. Instead, I was encouraged to focus on their affinity and non-profit sectors, as well as retail branch banking. At one point, I had a candid conversation with an Executive Officer at TD Ameritrade. She bluntly stated, 'You lack the network and support from people in the business, so keep working in retail banking and be content with your job.' I left Boston in 2014 and moved to Florida. In 2023, I made the decision to sell my house up North and relocate here to Florida permanently. Despite these setbacks, I refuse to give up. I have unwavering faith in my abilities and know that I can significantly contribute to our industry if given an opportunity and provided with guidance from a supportive mentor. It feels as though there's an exclusive club that I'm not allowed to join. The gatekeepers seem unwilling to recognize me as one of their own.'
Brian	Acker	I oppose any change that reduces the requirement for experience to obtain the CFP. I was in the industry for 15 years before obtaining my CFP.
Jessica	Adams	No issues.
Robyn	Adams	I support this change because pro-bono experience should carry the same weight as paid work. The process and requirements are the same as paid work.
Dennis	Adler	Its frustrating that one cannot apply for Pro Bono work without the CFP credential. And surely doing that work should be allowed and count towards the experience requirement.
Aaron	Ahlstrom	No opinion
Frank	Akridge	no problem with this
George	Allen	This is great for students in CFP Board Registered Programs to gain experience as they serve their fellow students and their community through money center organizations.

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Mitchell	Allen	Pro bono is often the most difficult planning. Why limit it?
Edi	Alvarez	Pro bono is NOT pro bono if you receive ANY type of credit.
Christopher	Amenita	Curious if there is a way to measure or obtain a vetted attestation, perhaps from an employer or another supervising CFP professional, that this person completed these pro bono hours.
Ramzan	Amiri	The Pro-Bono experience will be challenging to monitor and may not add value to the certification process.
Srihari	Angara	No opinion
Anonymous	Anonymous	Pro bono work shouldn't be part of the designation.
Bill	Aquila	This I agree with 100%. Unpaid internships should count too because those are still a reality.
Jaycob	Arbogast	I don't see any reason why pro-bono experience should not count just as much as for-profit experience. So long as the person is doing the same kind of work. I do a lot of pro-bono work as part of my role at the university. I see about 300 pro-bono clients each year. They mostly have less complex situations. More debt and credit questions, and fewer retirement planning questions, but it is still financial planning. Even in my private practice, my clients aren't typically coming to me with complex trusts or inherited IRAs, or DAFs or anything else where it can get a little complex. So 6,000 hours of for-profit experience might not be any more difficult than 6,000 hours of pro-bono experience. I would worry about new students entering the workforce though. If pro-bono counts, it should be done in a way where students aren't being taken advantage of with unpaid work. There are enough jobs out there that are commission only and I actively tell my students not to take those roles. They should be getting paid for their work. In my office, pro-bono is still paid hours for the staff. It's just paid for by grant funding instead of by the client.
Stephen	Archer	Experience is always very valuable.
Brenda	Armstrong	This needs to be moderated to ensure the pro bono hours are legit.
Laura	Armstrong	Pro bono work should be supported.
Christopher	Arnold	I support the proposal to the extent that the Pro Bono hours are truly qualified and substantiated.
John	Atwater	Pro Bono work should be guarded carefully and limited. The work performed by a qualified certificant should not be cheapened.
Drew	Backer	It is client facing experience. Pro Bono work can be more activity and practice than just logging hours in a seat.
Raymond	Backers	Work should be done under an established CFP which Pro Bono work may or may not incorporate.
Colleen	Baird	We should all think about 'un ideal clients' who IF they choose to change, can change- it is tough but very rewarding and they really learn a lot!
Dave	Balakrishnan	Should it be limited to 500 hours. What will be expected supervision for these pro-bono hours to ensure all aspects of the financial planning process are engaged.

# CFP BOARD

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Melissa	Ballard	I strongly support this IF they have some level of oversight, to be sure they are giving sound guidance via this experience.
Darryl	Banks	Great idea - probably helps both the candidate achieve needed hours and provides ongoing incentive for pro bono work (which is good for the brand).
Rick	Baray	I believe experience should come from any experience whether paid or not.
Andrew	Barfoot	Pro Bono is a great way to gain experience and provide meaningful help. This should be supervised, as we don't want pro bono clients just being guinea pigs for trainees.
Christopher	Barker	I have found pro-bono work to be beneficial and rewarding. The public perception of financial advisors is that we are greedy capitalists and having a pro bono addition to the program may help correct public opinion. I also find that working with clients pro bono inspires me. I love working with wealthy clients because their situations are more complex but I feel like the world and the education system completely ignore one of the most important skills in life, being able to responsibly manage ones finances. There are always going to be some people that need our help but arent really big enough to be profitable and I try to take on a few pro bono clients a year.
Lloyd	Barnhardt	This makes sense.
Andrea	Bartlett	I oppose of this change because it lacks definition of what constitutes 'Pro Bono experience'.
Tejuana	Baskerville (National Association of Personal Financial Advisors)	NAPFA supports pro bono planning and awards continuing education credits for its members' pro bono work, viewing pro bono work as a good source of experience as well as a valuable community service. HT
Edmund	Batchelor	I understand the push for Pro Bono at the Board level but this type of activity can cover such a large range of activities that it has a high potential for 'abuse.' I would be concerned without clear parameters (i.e. the experience is through a specified list of providers) it could quickly become the 'community service' requirement many high schools have where students take the quick and easy path.
Austin	Batista	How would one keep track of pro bono hours? Additionally, I don't know how any independent broker dealers would be okay with this or have the compliance procedures in place to differentiate/approve pro bono work?
Thomas	Baysinger	Sometimes the only way to get experience in rural or underserved areas will be volunteering. I don't think this needs a Cap Amount. Experience is Exposure whether paid or volunteer.
Chad	Bearden	CFPs would not get the high income / high net worth experience needed. Pro Bono is great and I hope others are doing some of this work, but clients who need free help are probably looking more for budget counseling and paying bills on time vs worrying about estate planning and portfolios.

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Phil	Behnen (Centennial Advisors LLC)	Will help everyone
Kaylee	Beier	Pro Bono experience still gives you industry knowledge and proves competency.
Brettq	Beimers	I love the addition of Pro Bono! I am a firm believer that everyone should get the best financial advice possible, regardless of ability to pay, within reason.
Claudia	Bellars	The concern I would have is how this will be reported. I routinely help a friend of a client with some basic financial guidance with no pay. This is simply trying to assist someone to get them on a path of financial wellness and success. Not sure how that would be used for someone getting their experience?
Jason	Bely	I would be in full support for this however pro-bono experience seems undefined, and thus easy to obtain. Can the CFP board facilitate the Pro-Bono process (for candidates and CFP professionals) with a more defined planning structure?
Anthony	Benante	It was mentioned at the Connection event in Tampa that there could be a quality issue for a non-CFP® professional providing advice. Unfortunately, I see this as a case-by-case basis, based on the person(s) giving the pro-bono advice. I think it could be difficult to create a 'standardized' requirement without further defining the formulation of the advice, who reviews it, and who delivers it. I apologize if this is defined, and I am missing it. If there is a defined process for delivering pro-bono advice by non-CFP® professionals, I would strongly support this.
Jon	Benecke	I don't agree to lower the 6,000 hour requirement to include 'pro-bono' experience. I'm not sure that can be measured well. Quality of experience matters to be successful.
Chet	Bennetts	The proposed change to allow candidates to count up to 500 hours of pro bono experience toward the 6,000-hour requirement of the Standard Pathway introduces a meaningful opportunity to integrate community service into the certification process. This adjustment reflects the value of pro bono work in fostering financial literacy and accessibility, while providing candidates with practical, real-world experience. However, it is important to ensure that the quality and rigor of pro bono experiences are comparable to traditional professional experience. Clear guidelines and oversight will be necessary to maintain the integrity of this pathway, ensuring it adequately prepares candidates to deliver competent and independent financial planning. Furthermore, 500 hours may represent a small portion of the total requirement; consideration could be given to whether this cap sufficiently incentivizes meaningful engagement in pro bono activities.
Charles	Berlin	This seems like a reasonable change.
Robert	Beswick	Encourages Pro Bono, which is good.
Kimberly	Bilbrey	As long as the pro Bono work done is equivalent to paid experience, through an approved and verifiable program, it should count.
Matthew	Blair	How is Pro Bono experience recorded and monitored. How readily available is it? What percentage of candidates would use this as part of their experience

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		reporting. I'm just not sure this applies to enough potential candidates to be additive to the current requirements.
Kathryn	Blake	This is a great way to encourage giving back to our communities; perhaps the limit should up to 1000 hours.
Steven	Blandino	No concern
Jeff	Blaser	I support incentivizing pro bono work, however, I do not understand how this will be documented and by whom...the person requesting the hours/credit?
Brandi	Blaylock	While I appreciate the pro bono hours, tracking that would be difficult, second how could you know if compliance is awarded, and if you are a financial advisor anyway and work for a firm that could cause issues with restrictions on how we are allowed to market ourselves and could cause other implications. I see more issues arising with this than not.
Brianna	Blount	This proposed change encourages candidates to participate in Pro Bono Work and would simultaneously increase CFP expose to the public from a marketing of the profession perspective and would also increase financial literacy/competence for those who would otherwise not hire a planner due to lower income/assets/etc.
Esther	Blue de Avalos	This will be important because it will benefit the community. It will also keep the professionals aware of the needs of the community.
Peter	Bobolia	What a wonderful way to allow for experience and growth. It exposes the general public to what it means to work with a potential CFP also. We should encourage Pro-bono work whenever possible. I would welcome any reason to do so.
Nick	Bodnar	While many may provide quality pro bono work, I think that paid work is a better proxy for quality.
James	Boles	It's good to do Pro-Bono work, but the large majority of the work should be a paid vocation.
Danica	Bolton	Ideally, the allowed number of pro bono hours should be much higher. I do not understand why this would be capped at only 500 hours.
Keith	Bonner	Drop the Pro Bono concept. It smells like virtue signaling.
Becky	Boston	This would demonstrate that candidates have had some real world experience, but would still require a significant portion of the 6000-hour requirement.
Jordan	Bowersox	Quit with the force feeding of the pro bono stuff. Volunteering time has nothing to do with competence
Christopher	Bowman	What better way to learn than by practicing along the way. I simply would encourage that there was some way to document the pro bono work.
Bryan	Boyd	The experience requirement should be handled via professional, paid hours of client-facing experience. I think the pro bono path could lead to moral hazard in accumulating hours or other issues vs handling actual paid customer/client relationships that have more scrutiny.
Cindy	Bragdon	I think the Pro Bono hours should be vetted to ensure they are appropriate for credit.
Nathan	Bragg	For example, in my case I have been working for 6 months and will continue to work in this industry until I take the exam. That should count for experience.

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Jason	Branch	I think that the pro Bono experience should not be capped at 500.
Tina	Brannan	I can see potential pros and cons.
Alexa	Brascetta	Pro Bono work usually is usually with people in a state of desperate need or there may be emotional conversations. I think you need your marks and experience in order to give those that need it most the best advice.
Melissa	Brennan	Pro-bono engagements typically do not have the same depth of engagement that is required in a professional engagement. Additionally, the information, education, and recommendations for pro bono clients sometimes has little cross-over to what a typical paying client may require.
Sarah	Brice	I strongly support allowing Pro-Bono work to count towards experience; as volunteerism and encouraging Financial Literacy exemplify the standards of Character and the Service to Others. As a consumer; I would be more Apt to trust my CFP if I knew or understood that among their vast training and experience is also the Free work that is done to serve others. As an Advisor who volunteers heavily with Financial Literacy, budgeting; insurance education events I see the need for these types of Pro-Bono planning in my community and I would feel personally grateful to be able to use my work in the service of others as included in my overall experience.
Sterling	Brightman	Yes the new CFP should have prior experience before they can function unsupervised. There needs to be some type of sign off by a supervisor that the experience has been completed. The individual should not be allowed to claim the experience without evidence.
Nancy	Briguglio (Brightworks Wealth Management)	Pro bono work levels the economic playing field.
Jack	Brod	Must be limited to very specific topics (e.g. debt management, budgeting), all hours must all be within that one topic, must be through the Foundation for FP since they vet, train, and administer.
Emily	Brown	No feelings towards this.
Gail	Brown	Not everyone can afford the services of a financial professional. The profession can make a positive difference by assisting individuals and organizations.
James	Brown	I am not certain why the Pro Bono experience even needs to be part of the process.
Armando	Brunis	That could be very difficult to validate
Brianna	Buckley	The self reporting indicates a possibility to misuse experience that does not adequately align with the personal financial planning process. The current standard requires initial certificants to have their experience verified by a previous or current employer. If, however this is only to include hours accumulated via an internship or similar work arrangement, I would be supportive of that change.
Chad	Budy	Get rid of the bachelors degree requirement if they can show 7 year or more of experience. This is what they do for the CFA and it's a much more difficult exam. In

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		my masters degree studies, I've found that my work experience has trumped the bachelor degree education by a lot!
Dallin	Bunnell	I think all experience should count.
Carson	Burke	Pro bono? That will be budgeting for ppl with no money.
Robert	Burns	I do not think that the CFP Board should mandate any Pro Bono work. This should be left to each person individually. I don't need one more thing to keep track of in my financial life. By the way, I do a lot of service in my community because I feel it is important, not because it is required. Stop increase such burdens. We also need to do what we can to attract younger people into this career. I see a generation gap, i.e., a lot of older professionals.
Emily	Bushong	Would the 500 hours be verified or just self reported? Self reporting leads to validation and credibility issues. Experience (pro bono or otherwise) should only count if it is verified
John	Butcher	Pro bono should be a strong component
Cassidy	Butler	I think this is a great way to encourage pro bono work that benefits the community and gives you experience
Jeff	Butterfield	I feel in some areas of the country it is or would be difficult for a potential candidate to fulfill 500 hours or any hours of Pro Bono experience.
Alan	Caldwell	We need to support and encourage Pro Bono work.
Christopher	Cameron	I support
Edward	Camp	Experience is experience.
Chad	Campbell	No strong feelings one way or another especially if the pro bono hours are legit and can be verified.
Claudina	Campbell	Is pro bono experience not currently recognized at all? If not, I think this is an improvement. I wonder if it should be capped at 500 and why pro bono experience is not valued as much as paid planning experience.
Joel	Carignan	This seems too easy to fabricate 500 hours of pro-bono work.
Letizia	Carlisto	Yes, using 500 pro bono hours toward the 6000 hour requirement seems viable and rational.
Sabrina	Carlson	Absolutely! Encouraging Pro-Bono hours is a great idea.
Donnie	Carpenter	As a profession attempting to encourage planners to continue to engage in pro-bono this goes in exactly the wrong direction. I would prefer a requirement that pro-bono work be completed through an approved organization, and team with the Foundation for Financial Planning to build a list of approved organizations.
Michael	Carretta	Giving back is an important part of continuing to enhance the Financial Planning future.
Charlie	Carroll	Recognize individual efforts in volunteerism as a part of experience fits with the CFP value system.
Anthony	Carter	I strongly support this proposal
Steven	Cass	As long as the Pro Bono experience can be verified and is not on the honor system.
Jonathan	Castle	One of the biggest obstacles to getting a good job is having experience. How can someone get experience if they have no job in that field? How can someone get a



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		good job in a field if they have no experience? This change may help alleviate some of this challenge and help younger CFP's get the experience they need to get the jobs they need sooner.
Robert	Chambers	If the candidate is accumulating pro bono experience hours that in other ways satisfy the requirement for experience, why limit to 500 hours? Pro Bono experience should be good for the candidate, and the industry, and the public.
Alex	Chan	allowing people to help others using the knowledge that they have acquired will give them that early confidence that they may be missing
Teresa	Chapin	As long as the Pro Bono experience is at the right level
Melody	Chartier	This makes a lot of sense.
Shaun	Chelf	This makes sense, as long as the Pro Bono experience covers the same areas. In preparing them for the CFP what is the material difference if they were paid or not? As an owner of an RIA that hires several folks right out of college, I can attest that many of them had volunteered in their campus financial planning programs, helping other students. This is as meaningful of experience as entry level work at a firm.
Jeffrey	Chesner	As it is my belief that the CFP Board is promoting doing pri-bono work, I understand this inclusion.
Susan	Chesney	I understand the encouragement of pro bono services and offering it as an option seems fine. However, it also feels a little like practicing on potentially lower-income/resource people. Will this work be supervised?
Kari	Cierley	I do not agree to allowing probono hours as part of the experience requirement. How can we ensure those hours actually took place? Work experience can be verified.
Jamie	Clark	What is the goal of this change?
Steven	Clark	I think this makes sense. For those just starting out, Pro Bono work could make a big difference in their ability to gain some experience.
Daniel	Clay	You need to have paid experience which helps ensure you put your best efforts into the planning process
Gary	Clement	Especially for those new to the field, this proposed change will provide more significant opportunities to be of service while meeting their 6000-hour requirement. It may also encourage ongoing participation in Pro-Bono work.
Chuck	Clifton	I would only support this if this was supervised pro bono work. Just volunteering without and structured guidance does not meet the objective of experience (i.e., teaching them how to be good planners). I don't think unsupervised pro bono surgical procedures count towards completing a residency for surgeons!
Daniel	Clothier	I agree this will allow individuals to help others and gain experience, without allowing it to be the sole contributor to their experience.
Aaron	Coates	I would think this number could be even higher if supervised
Monique Rene	Coates	I strongly agree & recommend this initiative fully and would love to see CFP Board create this new 'Pro Bono' internship experience sooner than later. I do believe that it will be needed. Thank you.



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Joseph	Coccaro	New individual will have a hard enough time earning an income and this will just make it harder for them
Lisa	Cochran	6,000 hours is a lot of hours. I worry that employers will not invest the time/resources in young professionals or career changing professionals seeking certification with that many required hours. Any amount of pro bono hours can help and shows great initiative on the candidates part.
Eric	Coffman	With the honor system, there's no way to confirm this experience unless certified by a supervisor.
Erna	Colborn	Unless pro-bono is supervised and receives some level of oversight we cannot ensure that the actual work will satisfy the necessary requirements
Akil	Cole	This would help them get experience and help the public and promote the credential.
Audra	Collett	Is the Pro Bono experience supervised? If not, I am not in favor of the change. If it is, I would be in favor.
Daniel	Conroy	If I am reading between the lines of this proposal, it sounds like the intention is to make sure experience is verifiable. I am in support of requiring meaningful verifiable experience.
Alyson	Coran	Pro bono can provide good experience so this makes sense. Would just need to prove the work they have done
John	Corrigan	Pro Bono has good intentions, but this add calendar constraints to multiple parties. I would support 300 hours toward 3000 hour requirement.
Daniel	Costa	Not sure I understand. As long as this does not mandate pro bono hours, I support.
Andrew	Cove	Anytime we can help the underserved is a positive in my eyes.
Beverly	Cox	I think that's great to acknowledge this helps the consumers with valid financial planning help and helps candidates reach that 6000 hours. that's huge
Stephen	Craft	The options for earning the 6000 hours is already too restricted. The US is facing an epidemic of citizens with limited financial literacy. Many of our fellow citizens with pronounced financial literacy challenges could never afford or have access to paid advising. We should be encouraging MORE pro bono financial advising. Limiting CFP candidates to 500 hours of credit for pro bono work seems entirely counterproductive. In fact, we should offer unlimited credit for pro bono hours working with clients. If anything, consider REQUIRING a minimum of 500 hours of pro bono client advising hours or teaching hours as a condition of certification.
Mitchell	Crocker	I think this would be a welcomed change as a lot of work is done outside of the office profession.
Lisa	Crosta	Pro Bono experience can be meaningful experience and 500 hours towards 6000 is a good parameter.
Tracy	Crowley	How would this be tracked? My only concern is pro-bono work may be less stringent in it's standard.
Jason	Croy	Any experience that is relevant to providing financial planning services should count.

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Jose	Cuevas	Sometimes the only advice they give could be pro bono, again like the pastor I hired.
Rachel	Currington	In theory I support this - but only if the allowable pro-bono work is closely controlled. I can see a lot of colleges offering 'pro bono' work in a meaningless manner in order to help new grads get their CFP quicker, and I don't think this would reflect well on the CFP brand as a whole.
Eric	Curry	Pro bono experience is valuable but it may not directly align with experience needed outside of the pro bono planning process. Capping pro bono experience at a 500 hour limit will allow for experience elsewhere and broaden the candidate's experience.
Michael	Curry	The CFP® marks represent someone's ability to provide unsupervised financial planning. You said it yourself... I absolutely don't think we should allow pro bono hours to count towards the experience requirement at all because in the eyes of the CFP Board, those unqualified individuals at that time do not have the ability to provide unsupervised financial planning services. I believe pro bono financial planning is invaluable but candidates are not yet ready to demonstrate this service and that is why they are candidates and not CFP® practitioners.
Michael	Custer	I'd say can take the test before but should certainly have real world knowledge or at least a CFP or long-term planner overseeing them for a while.
Aisha	DaCosta	Instead of setting a maximum to the amount of Pro Bono hours, the hours must be verified by the client and/or a supervisor. The requirement to be paid for the experience minimizes the value of the experience itself. Additionally, the Pro Bono experience must address three out of the seven steps of financial planning.
Michael	Daley	The ability to use pro-bono work to fulfill requirements seems like a win for both the profession, the professional, and the recipient of pro-bono services.
Craig	Darnell	I don't think it matters if a CFP candidate is paid for their services for the hours to count towards their experience requirement.
Galan	Daukas	Good idea
Brandon	Davies	Stop trying to push pro bono on CFP professionals who are already swamped trying to keep up with their paying clients.
Susan	Davies	Pro Bono work if appropriate is a great pathway to experience, i.e., working for a VITA program in the tax field
Patricia	Davis	Will defer to those that are closer to this. It may be that pro bono leads the candidate to the profession. My concern is that the pro bono work is supervised so that the experience is accurate and beneficial to the recipients.
Susan	Davis	Pro bono is a legitimate way of getting experience, and sometimes the only viable method while changing careers. Just make the verification process more serious. The danger is, it's easy to fudge.
Matthias	Day	As long as it is actual experience, I believe this could do a lot of good. I also think this would encourage future CFPs to have a more service oriented mindset.
Alan	De Michele	Pro Bono work is for individuals who do not/can't access traditional CFPs with the associated costs. These individuals are most in need of the CFP and their experience. Having a CFP candidate working towards the certification may not be

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		the best option for the client. I believe the experience matters most for the client. If the Pro Bono work is offering to sit with a CFP then they should sit with a CFP.
Dusty	Dean	Pro Bono is generally for people of lower income. It is not high level financial planning. A free doctor probably isn't as qualified for surgery as a doctor that charges (with few exceptions).
Garrett	Dearden	I have done pro bono FP with Advisors Give Back (a 501c3). Pro bono planning is real planning since it integrates you with real people to apply the principles taught in the CFP coursework.
Miguel	Delgado	As long as it's through an approved vendor
Jonathan	DeMoss	I can see people taking advantage of this rule.
Bob	DePasquale	Pro bono hours should be more encouraged.
Dan	Devine	What is the current maximum? Is there no maximum?
Ashish	Dhamal	I am not sure about this. My understanding of pro bono is to provide services at a lower or no cost could be an issue for some, especially 500hrs.
Francisco	Diaz	Moreover, experience in managing/planning one's personal finances should also be accounted for and credited.
Katherine	Dibbern	It can be hard, especially for career-changers to get started, and pro bono volunteer time is an excellent way to get hours if well-supervised.
Michael	DiGrazia	While pro bono work is vital, it is not a substitute for working with our typical clients
Ryan	Dillon	I believe this could assist with candidates meeting the experience requirement.
Ashley	Dixon	Probono work is some of the best, authentic and rewarding we as CFPs are able to do with our expertise.
David	Doherty	I don't believe one has to be compensated to fulfill financial planning experience.
Mitch	Doman	As long as it can be clearly documented as qualifying hours, I think this is a great idea and a great way to fill an unmet need in the community.
Brian	D'Orazio	Most pro bono work is slow complexity and a resulted limited experience.
Daniel	Dorval	Pro bono experience is still experience.
Sallie	Doty	This seems difficult to track.
Dominic	Dougherty	If the pro bono experience is verifiable, I don't see the rationale for capping it so low at one twelfth of the hours requirement
Neil	Downing	A certificant should not be required to pay additional sums to the CFP Board to report Pro Bono hours and have those hours processed.
Renee	Duba	Pro bono experience, while valuable, does not have the same quality standards.
John	Duda	If I advise my family at no cost, does that count? I think the broadness of the change invites fraud.
Josh	Duncan	I am not opposed to Pro Bono hours being reported toward the experience requirement. However, Pro Bono work could be exploited to attain the experience at a faster pace due to fraudulent reporting. If Pro Bono experience is allowed I recommend there be a validation of some of the Pro Bono planning work that was provided. The hurdle to using Pro Bono hours should not scare a certificate from submitting the work they have completed. Only certificates who want to exploit

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		this rule will be upset about the requirement to submit three to five of the Pro Bono plans they have completed/implemented/implementing.
Michael	Dunlop	I oppose the proposed change allowing up to 500 hours of pro bono experience to count toward the 6,000-hour Standard Pathway requirement. While pro bono work is valuable and can develop interpersonal and problem-solving skills, it often focuses on basic financial counseling rather than comprehensive financial planning. Many pro bono engagements center around budgeting, debt management, and navigating government benefits—important areas but not reflective of the complex strategies required when working with diligent savers and those focused on growing wealth. The most impactful financial planning often involves advanced considerations like tax-efficient investing, retirement planning, and estate planning—areas less commonly addressed in pro bono work. To maintain the high standards of the CFP® certification, experience hours should come primarily from engagements that reflect the full scope of financial planning. While pro bono work is commendable, it should not substitute for the professional experience necessary to ensure CFP® professionals are well-rounded and fully prepared to serve clients effectively.
Blaine	Dunn	The candidate needs to document the pro bono work through a third party. We have to document CE credits. Need to document pro bono work.
Dylan	Dwyer	I think this is a great and practical way of getting CFP candidates into the community. It also helps get those who are qualified attain the marks quicker
Kedisha	Ebanks	The 500 hours of Pro-Bono experience should be towards both standard and apprenticeship pathways.
Jacob	Echols	I believe the time requirement is to limited if anything. I do not support using pro Bono hours in this way
Peyton	Eckert	I do not understand this change unless Pro Bono experience is being double counted toward the 6000 total hours needed. Is Pro Bono experience not already counted toward normal experience in terms of time spent completing financial planning?
Barry	Eckhardt	This is a reasonable adjustment to the 6,000 hour requirement.
Richard	Eddy	Pro Bono planning is good for the profession, and the work being done on a pro bono basis is every bit as valuable and relevant as paid work.
Ryan	Edmonds	This seems redundant. If candidates are allowed to accumulate work experience, this could accelerate the process, but would they be asked to the pro bono work before they are a CFP?
Larry	Elkin	In this requirement and in other, the CFP Board seeks to enlarge its role from establishing standard by which licensees practice to dictating how they must practice -- specifically, by trying to impose a pro bono service mandate and thus comander more of practitioners' time than is necessary to meet the expectations of clients who hire financial planners. This is inappropriate and diminishes the appeal of the CFP® mark to firms and licensees alike. Practitioners serve their communities in a variety of ways, many of which would not count as pro bono service. Some of my colleagues serve on their church and community school

First name	Last name (c/o firm name, if applicable)	Response
		boards, for example. Others devote time to mentoring youth or volunteering in other forms of community service. A pro bono mandate would ultimately steal time from these activities. In addition, firms attract talent by paying competitively with the individual's earning capacity in other occupations. A pro bono service requirement, if large enough to actually be significant, would impair that ability either by reducing available cash or by increasing demands on staff time to a point that impinges on work-life balance or community service. Encouraging pro bono service as one form of community involvement is fine. Mandating it is inappropriate, and effectively mandating it through backdoor methods such as increasing CPE requirements and then allowing pro bono work to substitute for that CPE is simply dishonest.
Gina	Ellen	This doesn't effectively train CFP candidates. Bro Bono work is typically for those who are financially illiterate, and while helping them is admirable and should be encouraged in some way (perhaps a program or 1 hour of CE for doing so for CFP professionals who already have the designation), it should not count as experience for the purposes of those still learning obtaining their certificates, as the concepts used and the effort I've seen people put in for bro bono work is not comparable to when there is an exchange of payment for service. I've also noticed that for pro bono work, CFP candidates' supervisors won't be thoroughly reviewing their work, because it is not in their best interest to do so from the perspective of time management. These supervisors will find time for a paying customer and more closely scrutinize the work of their planner/CFP candidate vs when they know their planner is doing a bro bono place. That's definitely not how it should be and I don't think it's okay, but it's the reality I've seen working at many different firms.
Larry	Ellis	I don't do pro bono work.
Ivy	Emerick	There always seems to be a need for Pro Bono work. It is a great way to gain experience as well as helping the public.
Scott	Emley	the more pro bono work/experience the CFP organization promotes and encourages, the better.
Angela	Epley	Capping Pro Bono experience does a disservice to initial certificants, the wider community, and even the CFP brand overall. If we're the gold standard, we should be doing more Pro Bono and community service: not less.
Nicholas	Erwin	It is difficult for some people to get experience and it's difficult for some people to get quality advice. This is a perfect way to help both groups.
Bernardo	Escobedo-Diaz	Pro bono work allows underserved communities gain knowledge around financial planning.
Roderick	Evans	Pro bono is a valuable community service and is very similar to work done with or for paying clientele
Amanda	Farr	I support this change.
Joseph	Favorito	Pro Bono work does not require enough complex topics in most cases.
David	Fedorka	Agree with current standard
Tyler	Fedrick	I support this fully. Financial planning covers an extremely broad range of services.

First name	Last name (c/o firm name, if applicable)	Response
Jonathon	Ferguson	Pro-bono is a great way to gain experience and provide uniquely valuable service
George	Fernandez	I would be in favor of supervised Pro Bono experience. However, I'd like to see that raised to up to 1,000 hours.
Ray	Ferrara	While I have indicated a 'no opinion', there is some concern. First, I totally support Pro Bono efforts. But according to our standards when providing it a CFP(R) professional must still do so with the same vigor as with a regular client. If the candidate is under the supervision of a CFP(R) professional, I get it. If not, I worry about compliance issues.
Emerson	Fersch	Not seeing a mandating pro bono work makes somebody more competent, and most people who are seeking these credentials are probably new to the industry and are trying to get their business up and running
Shelby	Ferstl	Disagree / would require a better understanding of what 'pro-bono experience' consists of, or the guidelines surrounding the exception
Russell	Fields	Sure. If the pro bono hours are documented and truly related to developing professional experience.
Alice	Finn	See end
Kathryn	Fisher	This is fine, as 5500 hours of helping clients who face more traditional issues that we would all face with our paying clients is plenty, and the pro bono experience can be very educational for the provider, as well as incredibly helpful for the pro bono client.
Tim	Fliam	A limit on the pro bono side seems fair, because these numbers can be harder to track. And dealing with paying clients could give more complex cases as well.
Kathryn	Flom	I would only support this if the pro-bono work is specific to financial planning. If you all the sudden have CPAs and JDs with CFPs, does their pro-bono work for tax planning and estate planning count? Again, the CFP designation represents those who have worked and have experience in doing comprehensive financial planning.
Michael	Fogarty	I see no reason why it should not count.
Ed	Foltz	Provide pro bono when not finished with Standard Pathway? That seems contradictory in nature. Would think Pro Bono work is often completed for individuals lower on the socio-economic ladder. These people should not be receiving Pro Bono from those little experience.
John	Foote	Probono experience should not be considered less of a financial planning experience. Just because it's probono doesn't make it less legit. If anything the opposite view should be taken and probono work should be encouraged
Adam	Fowler	I'm not certain we should encourage people to pursue poor planning for a number of hours before they can become a real planner. That seems to hurt the client. If they are educated and work in a relevant industry, we should allow them to become a CFP. I don't like the idea of them experimenting on clients to prove they can become a CFP.
Hank	Fox	While I support pro bono initiatives, I believe there should be some guidelines to ensure that the experience reflects elements of the financial planning process. Otherwise, non-related experience may be used in lieu of relevant financial planning experience.



# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

First name	Last name (c/o firm name, if applicable)	Response
Mike	Fox	Support if hours are earned at some qualifying organization where there is oversight and not through self-reporting or unsupervised experience.
Kerry	Franklin	I think this is ok as long as it can be verified properly.
Gloria	Franz	You risk having individuals who have been trained by an industry that doesn't always follow the CFP standards and hope they can be retrained.
Marc	Friedman	Although I think it is a sensible change to allow 500 hours of Pro Bono experience toward the 6000 hours experience standard pathway requirement, I think the Board should also consider allowing corporate financial planning experience to be counted as well. Corporate financial planning experience is also directly applicable to demonstrating a professional's ability to provide unsupervised financial planning, but yet that is not permitted under the current standards.
Guy	Fulcher	A CPA designation should quality for all hours required
John	Galbraith	Pro bono work is just as valid as for profit and reflects favorably upon CFO that it values pro bono financial planning services.
Ann	Garcia	I like this idea in theory but in practice, pro bono work tends to be quite different from financial planning. And how does this get tracked/verified?
Rachel	Garner	I agree with the recommendation. This would further encourage pro bono work in the communities too.
Allen	Garner Jr	Same rationale as previous question. Second, I believe in 'giving back,' so the Pro Bono fits neatly within that.
Cody	Garrett	I strongly support Pro Bono's experience but strongly oppose the maximum threshold of 500 hours.
Stephen	Garrett	i do not agree with the unsupervised planning counting towards it. this is a gray line and not easily defined.
Kenneth	Garwood	Pro bono work only reinforces the public's positive view of our industry.
Michael	Geitner	Pro Bono hours should not count towards experience requirement.
Mark	Gelbman	Giving back to the community is important to the planning community and proves that planning is important as opposed to focusing on solutions.
Matthew	Gelfand	Pro bono experience is worthwhile and the proposal would enable applying only a limited number of pro bono hours toward the experience requirement. This proposal seems reasonable.
Marc	Genereux	Pro Bono work enhances the exposure of the certificate by getting it out there in front of more people. While I mainly practice tax advice, planning and preparation, I do a lot of 'value added' financial planning for clients. Many still think they need an investment advisor for financial issues (other than just handling their money). They are missing the opportunity to work with CFP's with a broader base of knowledge.
Kevin	George	Pro bono is great in theory, but teaches people to give away financial advice which is the opposite of how they should be doing it. If everyone charged for financial planning this would be different and until it is an industry standard, I will oppose this involvement from the board.
Victor	Gersten	I support it

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# CFP BOARD

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Michael	Gibney	This would be difficult to monitor. If it were to be implemented, I would ask that the pro bono hours are through an organization like the Foundation for Financial Planning or similar where the pro bono candidates are vetted, and the hours can be tracked.
Amy	Gierak	Will the standard be 3 hours of Pro Bono time spent per 1 CE credit, as in subsequent proposals?
Jonathan	Gillam	This seems like an ethical way to support other people.
Allen	Gillespie	I am utilizing the accelerated path so not in a position to voice an opinion regarding the standard pathway.
Joseph	Gitto	Encouragement of pro bono services
Charles	Glasse	I have been. Considering pro bono work and this would be terrific incentive.
Thiago	Glieger	While I understand the thought and heart behind this, I see potential for abuse. It's hard to be able to verify what kind of work was done, and if the experience is qualified for counting towards experience required.
Peyton	Glover	I can support this approach. As an example, perhaps the candidate is working with an experienced mentor who is providing pro bono work. This can give the candidate exposure to what might be expected once that candidate enters the actual financial planning 'real world'.
John	Godfrey	Sounds reasonable
James	Golden	Does not seem to suggest any improvement to the value or reputation of CFP, how to monitor?
Pedro	Gomes	Pro bono hours allow younger and inexperienced candidates to more quickly build up a wide variety of the skills necessary to be a CFP professional in a manner that poses less risk for their firms.
Tim	Goodwin	It seems like a no-brainer to me
Daniel	Granucci	I see no downside here.
Lois	Gregson	I would like to see more CFP access to individuals who are in need. Allowing candidates to meet a portion of the requirement in this manner would be a bonus for individuals and the industry.
Andrew	Griffith	Some people who want to obtain the CFP are not doing this for income. Some people are quite content with obtaining knowledge and then providing their services entirely for free to others. I do not understand why the CFP Board would want to prevent the people who provide financial planning services entirely pro bono to have to do this for compensation. After all, those pro bono service providers can actually function as CFP ambassadors better than many who are compensated for those services. I think the brand awareness of the CFP credential would be better off by embracing those who want to provide this for free. (Related to this thought process, some members of religious orders would like to obtain the CFP and they are not allowed to profit from their labors because of their vows of poverty.)
Kayla	Grodi	I support this if it's supervised and documented hours that include 3 of the 7 steps of the financial planning process.

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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 am unclear as to whether there is currently a limit on Pro Bono experience hours, but I strongly believe that candidates should be credited for, and encouraged to complete Pro Bono work as part of their CFP requirement.
Joshua	Guadarrama	I see pro bono as a viable path for those who get their CFP, so it should be fair to include those hours.
Phil	Guerrero	Industry experience is important and Pro Bono has varying degrees of involvement. I like the limit with the remaining hours coming from paid for experience with a higher degree of transparency and responsibility.
Jake	Guller	Pro Bono work is great for the profession as it allows financial planning to be more accessible to those who would otherwise be unable to afford it.
Brandon	Gunderson	Internships are okay
Kayla	Gunderson	How will this be monitored?
Levi	Gunn	It would benefit those, like myself, who had internships. But I wouldn't say any internship I had prior to my real job was even 50% of the true job of being a planner.
Scott	Gutman	The nature of the work, not its paid status, should be the relevant factor.
David	Haas	I think this can be very valuable on multiple levels. I am in full support.
Tiffany	Hackney	I do not see the need to add a cap to the Pro Bono hours. Feels unnecessary and pointless.
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.
Nicholas	Hagan	Experience is experience, whether paid or unpaid - as long as it can be verified.
Lucas	Hail	I have found pro bono advising covers many topics unique to the population that can't afford paid advice, that are not typically covered in a CFP related job. I don't think this is helpful in accumulating experience advising clients.
Ted	Haley	I agree that true pro bono financial planning should count towards the experience requirement.
Andrew	Hall	as a pro bono participant for veterans through the FFP I have found the process both enriching professionally and rewarding personally so I am a big fan. My ask would be to provide guidelines and monitoring around the sources and self reporting of pro bono hours. I have seen in other settings where there was wide variability in the reporting of volunteer hours for the same event so understanding how to attribute one's hours is critical to the credibility of pro bono effort.
Forrest	Hall	Candidates could get that experience in an internship
Thomas	Halonen	I don't expect anyone to work for free.
Jason	Hamilton	Strongly support.

First name	Last name (c/o firm name, if applicable)	Response
Sarah	Hamilton	Why should there be a difference between pro bono work quality and paid for work quality? As long as there are appropriate proof of work methods I don't see this as necessary.
Trent	Hamilton	Why hasn't this been a thing already? CFPs should be well known in disadvantaged communities, this designation should be the first a disadvantaged person thinks of when they find themselves in financial difficulty. Make it more than 500 hours. The CFP designation should be known in part for what their CFPs do out of charity. The board has a real opportunity to directly impact countless disadvantaged peoples lives with this decision.
Kade	Hammes	As long as the Pro Bono gives them experience doing full financial plans, I wouldn't care if it covers all 6,000 hours.
Diane	Haneklau	I need more details on this change
Noah	Hankin	This process should at least be supervised, as it leaves far too much ambiguity about what qualifies as Pro Bono work. For instance, could something as casual as discussing credit card options with a friend potentially count?
Michael	Hanrahan	Why would pro-bono experience be any different than that which is charged to the client? The only difference should be the pay level, not the approach, scope or quality of work. there are 6,000 experience hours required? At 3 years, that's more than what was required for my CPA certificate. If your talking about supervised direct, hands on planning and working with the client, 2,500 hours should be adequate
Renee	Hanson	I don't see what would constitute the depth of the pro-bono work. Until there is clarity on requirements it opens the door for abuse.
Parker	Hanson-Harden	Experience is experience.
Mingming	Hao	This makes sense
Danielle	Harmon	As long as there is some oversight from a CFP professional, I see no problem with this.
Dean	Harris	Pro bono work though the FPA or with an attester should count for at least 500 hours.
Jessica	Harris	All 6000 hours should be able to be through pro bono work. Pro bono work is equally as valuable
Josh	Harris	In certain settings pro bono may be the only option for practitioners to gain experience.
Adele	Harrison	This provides candidates an opportunity to help lower income families. It is a good service to society.
Brenton	Harrison	As long as the pro bono hours are monitored and can be confirmed, I see no reason why there should be a cap on the hours credited.
Michael	Hathaway	Same as before - how does this help? What is the expected result?
Kim	Hayes	500 does seem like a lot; pro bono experience isn't fully representative of the kind of work CFP(R) will actually earn a living doing.
Stephanie	Hays	It is still hours put in demonstrating application of knowledge on the public's behalf.

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Lindsey	Heglar	I don't understand the benefit or difference enough to have an opinion.
Daniel	Heidel	As Pro Bono experience is both a great way to give back to the community with our time and a way to further elevate our skills, I find this a fair reward for the time given back.
Anthony	Hellenbrand	I am in-favor of pro-bono experience counting towards an experience requirement.
Tiffany	Helleson	It would provide them with good experience over a wide array of individuals.
Brenton	Helms	Feel that this is appropriate.
Tyler	Helton	I don't see any issue with making pro bono experience an option, but it should not be required.
Joel	Helzer	This is great though the board needs to provide verbiage that can be used here
Kathryn Shea	Henningsen	Assumes that the 500 hours of Pro Bono experience is thorough and they have learned a long the way... it still would require 5500 hours of the 6000 hour standard pathway so I can live with that.
Terrence	Herr	Pro Bono should not be required or considered.
Andrew	Herzog	Volunteer work shouldn't be 'compensated' in any way - you're doing it out of the goodness of your heart, that's it. Therefore, allowing some of the experience standard to be earned through pro bono I think is misdirected.
Matthew	Hess	Do not agree - bc this does not guarantee the pro-bon work that is done will be of value to the people receiving the planning
Joshua	Hester	This seems like a positive change. I have not done much pro-bono work, unless you count all the free plans I've done for prospects that did not convert (and I do.) I plan to begin doing deliberate pro-bono work this year, and I could see a rationale for making it required if organizations to make target underserved communities are accessible to advisors at all firms.
Sam	Heveroh	I don't care. Doesn't seem to benefit or hurt.
Jan	Hilfer	I would support, as long as the Pro Bono experience is substantiated by a verified letter of some sort.
Jesse	Hindson	Seems like a great way to provide goodwill for the community and provide training/experience for those interested in pursuing the designation.
Jeff	Hinish	I don't understand. Is there currently a requirement for 6,000 hours of financial planning related experience? And if so, do Pro Bono hours not count toward that requirement? How is the 6,000 hour requirement currently reported/required, and how does this new proposal change the requirement?
Deb	Hinton-Brown	Yes hands on experience can be quite valuable as long as there is a means to assess demonstration of desires knowledfe/skills.
Mark	Hoemann	complete bullshit
David	Hoffman	This has potential to be a positive or a negative change, depending on the ability to verify the legitimacy of the Pro Bono experience.
Patrick	Hoffman	Would there be oversight on the work? What I interpret pro bono to mean is an accredited professional is doing work at no charge, ie CPA, JD and CFP(r). Would the applicant have one of these credentials to validate to advice (obviously not CFp).

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Garrett	Holcombe	Like the previous proposal, experience is experience and it shouldn't be limited subjectively.
David	Holland	Comment previously provided (this is a second submission that is being made to provided expanded comment on Board's ability to select areas of continuing education)
Benjamin	Holm	Young or new advisors may not have a lot of capacity for pro bono work. They are trying to build a book of business and make an income. Does the CFP board want rooking financial planners doing the majority of financial planning? or would they prefer the experts to help individuals? I prefer the experts, not the rookies.
Scott	Holman	Pro bono should always be voluntary to set yourself apart. Forcing volunteerism is WRONG!
Pamela	Horack	6000 hours is a stout number. Allows pro bono experience is a big help toward the goal.
Josie	Horn	Finding ways to complete the experience hours as a career changer already feel like an uphill battle and I will speak only for my personal circumstances but I will need to continue to work my current job full time until I am able to find a relevant financial planning position that will accept me with entry level experience. The allowance of completing Pro Bono hours not only allows me to complete some hours outside of my full time job but also allows me to have experience working with organizations that I have a strong ethical and moral tie to, which is a large part of the reason I wanted to join the profession in the first place. While I recognize that the profession requires a certain level of competency I don't necessarily equate higher relevancy to paid work over un-paid work.
Aaron	Horne	Why is experience gained through charitable work less valuable than work a client pays for? Could this not be circumvented by charging an otherwise pro-bono client \$1 for services, and then you get into the business of price setting and it seems like a whole big mess best avoided. I am unsure about this reasoning behind this one, and I therefore must strongly oppose this change.
Landon	Horne	I like a cap for pro bono as all 6000-hours shouldn't be attained this way.
Justin	Horowitz	Pro Bono helps the people who truly need our guidance. Providing some form of benefit to CFP professionals, other than altruistic fulfillment, could help encourage more work done in this area.
Brent	Horvath	If you aren't a CFP yet, why should you be able to give free advice and get credit. People receiving pro bono advice should get it from qualified CFPs - not people looking to become CFPs. Keep the current standard.
Jim	Houghton	I work for a non profit and very much appreciate pro bono services by experienced professionals. This is worthwhile experience which should qualify.
Kyle	Householder	I like the idea of adding pro bono work to the experience list. I think making pro bono opportunities more accessible would be an important next step.
Noah	Housler	This could result in individuals providing off the cuff 'financial planning' to friends and family and caling it pro bono work toward the qualification
Brian	Houts	i think pro-bono work is too unregulated and 'squishy' in it's quality to be counted.

First name	Last name (c/o firm name, if applicable)	Response
Johanne	Hove	I support the changes since the environment is ever changing and CFP profession should adapt the environment through introducing new changes
Adrian	Hovey	I would not support if the pro-bono work is not regulated or measured.
Alec	Hubbard	According to our website's page titled 'The Paths to Experience' in the FAQs 'As long as Experience Standards are met, this (Pro Bono) experience can qualify'. It's unclear why, assuming experience standards are met, a CFP acting in a pro-bono capacity should have their experience be considered less valid or capped. From a brand perception this change makes our organization look less altruistic (which is bad), and because we already enforce experience standards in pro-bono work we wouldn't be increasing the quality of experience CFP candidates have.
Joel	Huet	I don't have a strong opinion on this
Lisa	Hunter	How do you know the Pro Bono is legitimate & meaningful? Don't people who need the assistance but cannot afford it have the expectation they are getting good advice? If candidates are unsupervised how can that be monitored?
Dave	Hutchison	Sounds ok...
Amy	Irvine	While I currently have time to do pro-bono work, there are certainly phases of life that having this required would create a barrier, especially for women. I love the idea of having a requirement of a few hours per year, but not necessarily this prior to becoming a CFP.
Jacob	Ivey	I think pro bono is great, i'm not sure on the weighting here. I think fundamental education is highly important and decreasing it doesn't make sense i believe
Gautham	Jain	I think it should be increased to 1000 hours because the candidates are exposed to tailored practical experiences.
Richard	Janes (Charles Schwab)	Per our compliance department, 'This type of pro bono work is uniformly prohibited for all reps across Schwab because the risks cannot be consistently mitigated. There are certain small pro bono programs organized through Schwab that may qualify, but we should not be comfortable relying on the CFP Board's supervision of pro bono activity.'
Dominic	Javier	Dito
Bryce	Jenkins	I do not feel self reporting Pro Bono hours without a method of review/checks & balances should satisfy the experience requirement. This change would be better if the Pro Bono hours are administered via a CFP based hub.
Robert	Jeter	I don't feel strongly about this. However, pro-bono experience will typically involve less complex clients and possibly distort the 'quality' of experience. I like limiting the amount that will count towards the requirement.
Carol	Johnson	Pro bono work is experience
Mark	Johnson	I strongly oppose requiring any level of pro-bono work or using it to help qualify for any level of recognition. We're running businesses, not charities, and most of us have charitable interests that we support. Most pro-bono work involves low income people and very simplistic planning which generally would lead to loss of revenue for the advisor and would generally provide inadequate experience to apply toward any level of certification.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

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Annette	Jones	Pro bono work should be accepted, as long as the actual work done qualifies as financial planning per the CFP Board's standards.
Audrey	Jones (Financial Life Designs LLC)	I believe that would be a wonderful way to get face to face experience.
Audrey	Jones	I think this a great way to get more hours for CFPs
Douglas	Jones	this is only 1/12th of the total time needed to satisfy the 6000 hours. I dont think its something that will be utilized often, but dont see the harm.
Conner	Jordan	Pro bono is a great way to give back to the community and to build skills
Kevin	Jordan	There will be the temptation for many to report work done for family members as Pro Bono experience. Work done for family members could be held to less scrutiny and may not reflect the quality of work expected from a fully trained Certified Financial Planner professional.
Mindy	Joseph	This would allow those pursuing the certification but who may not have employment with a planning firm to still make progress toward the certification.
Joshua	Justice	Pro Bono work often comes from planners working with those with fewer financial resources than 'typical' clientele. These hours often present their own challenges that help advisors grow both their knowledge base and soft skills beyond what is learned in more traditional planning settings.
j	k	You get what you pay for.
Henry V	Kaelber	Indifferent about this change
Melanie	Kahrs	Strongly support this and love it! This can also indirectly have an impact on potentially the diversity goals the CFP has put into place and the efforts there on impacting communities and creating sustainability.
Michelle	Kaicener	I can visualize myself offering assistance to people who do not have high wealth and this would be a benefit.
Rebecca	Kallies	I oppose unless there is a way for the board to verify the pro bono hours
Zach	Kammeraad	No strong opinion on this one as well.
Jennifer	Karch	Pro bono is a great way to start and would help give incentive to assist those in need for free
Robin	Karpan	I love the thought of our profession doing more to help people with less money. Those are the people that sometimes need it the most. But I do worry about how hard it would be to certify that the pro bono work was actually done.
Glenn	Kautt	I am a retired former CFP, financial advisor and founder/cofounder of three financial planning firms, a former Trustee of the Foundation for Financial Planning, past chairman of the National Capital chapter of the Financial Planning Association and former columnist for Financial Planning Magazine for 14 years. I have authored/co-authored three books on financial planning matters, and have four professional peer-reviewed research papers published in the Journal of Financial Planning. The last firm I last co-founded and retired from currently has nearly 15,000 clients and \$30 billion under management. During my 30+ year career, I participated in many pro-bono assignments, and as a trustee of the FFP, engaged in pro bono planning with a wide variety of organizations across the

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		socio-economic spectrum. I also spoke regularly at national, regional and local financial planning conferences and meetings on a wide variety of technical planning topics, including introducing the practical aspects of Montreal Carlo simulation to the entire financial planning industry. Based on my substantial experience in every technical, academic and practical planning application across the entire financial planning spectrum, I can attest that pro-bono planning experience is a realistic professional experience, and should be allowed. Further, some specific amount of hours should be mandated as part of the Standard Pathway requirements. Additionally, some level of pro-bono planning should be counted as part of the recurring training/activity requirement for continuing certification as a CFP. Thank you for considering my recommendations! Glenn Kautt MBA formerly: Certified Financial Planner Enrolled Agent Accredited Investment Fiduciary Analyst
Ashley	Keamo	Unless an individual gets an entry-level position for all of their hours, it can be difficult to complete the hours in a timely manner and including pro-bono work would greatly help. For example, I am a PFP graduate student who is not able to work full-time and is worried about completing all 6,000 hours within 5-years due to my education commitments. Adding in pro-bono work that I already do would make this an easier process.
Kathleen	Kee	Having someone that has not completed their training provide advice to those that may be the most vulnerable seems irresponsible. Would you allow a law student to give legal advice? A medical student only monitors medical procedures until they have passed their exams. Those seeking probono advice I suspect are those that can't afford to pay for advice. Giving them advice from someone not certified is doing a disservice.
Patrick	Kelly	I'm not sure if this pertains to internships . 500 hours of pro bono work seems like a lot. I've never run across a planner with this amount of pro bono work.
Elaine	Kendell	Please specify '500 hours of Pro Bono experience' doing what activities? Name some examples that relate to financial planning.
Kit	Kenny	I don't like all these pro bono requirements. I think it is a personal decision how and who I help for free. I don't keep notes on everyone I give free professional advice to. I consider it a responsibility of my Christian faith.
Dillon	Key	Pro bono work is still financial planning
Henry	Kincaid	Provides a level of actual experience that maybe wouldn't be attained by some candidates otherwise.
David	Kinder, RFC, ChFC, CLU	See my previous comment. I don't like micro-management.
James	Kirkpatrick	There should be no pro bono experience standard. Especially for those who reside in a rural area.
Eric	Kirste	I think this is a great add on. Some candidates cannot get all the needed planning related work done through paid means.
Andrew	Kish	I believe that adding a pro-bono option would be beneficial, but to inhibit exploitation of reporting, the maximum should be lower than 500 hours.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

First name	Last name (c/o firm name, if applicable)	Response
Ryan	Kittrell	A good way to help more people and gain experience at the same time.
Kurt	Klobassa	Getting the required hours is extremely difficult if you have no prior experience
Alan	Kneale	The experience should be based on meeting activities required of profession not whether paid. More probono should be acceptable up to 50% of hours if meeting at least 5 of 7 areas
Martin	Knight	Sets up high barriers to entry--which is probably what the current members want--in an effort to restrict competition. Many of us work in areas where there is no or little opportunity to provide Pro Bono experience. This requirement has little to do with increasing the competency of CFPs.
Michael	Knight	This change is good for the brand and excellent experience for candidates.
Robert	Kocembo	We need hours. And Pro Bono.
Joseph	Kochera	I cannot support this unless the Pro Bono hours reported come from a source that has evaluated the performance of the individual reporting the Pro Bono hours. There is a lot of moral latitude that can potentially be taken regarding this and the CFP designation is too well regarded to dilute the quality that it represents.
Joel	Koon	I agree that pro bono work should be counted up to a degree for the 6000-hour requirement. I also believe that you should not be able to accumulate a large portion of the hours via pro bono work, to maintain standards.
Brian	Koonce	Pro bono experience is too simple (generally) compared to comprehensive financial planning for middle or upper class clients. It's not the same level of planning typically
Brian	Korb	Yes, pro bono experience that is related to financial planning should count and be encouraged.
Mateusz	Koszarek	Allowing for Pro Bono experience towards the 6000 hour requirement further dilutes what the CFP represents as a PLANNING credential. pro bono hours are subjective and so I'd like to further understand how the CFP board is going to make sure that the 500 hours, likely self-reported, are legitimate and should actually count towards the 6000 hour requirement.
Ross	Krause	Yes Pro bono hours should always be encouraged and supported in our industry.
Scott	Krizek	An inexperienced cfp candidate should not give advice to people who have the least resources
Austin	Kunzler	Pro Bono hours still involve steps of the planning process.
Bryan	Kupchik	All candidates should meet the requirements of 4000 hours of apprenticeship and the additional experience required that's verified prior to holding the CFP professional designation. Pro Bono experience and services should only be provided by CFP professionals who have the expertise to provide that type of service with credibility.
Julia	Kwok	This allows interested candidates to accumulate hours through relevant volunteering work and promote admirable qualities of the financial planning profession.
Gerry	Lachnicht	I believe that supporting pro bono work improves the reputation of the CFP organization and the profession.

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# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

First name	Last name (c/o firm name, if applicable)	Response
James	LaFleur	Too hard to record and too much room for fraud
Lars	Lambrecht	I don't believe Pro Bono experience should count toward the requirement.
Michael	Lancaster	I would support counting Pro Bono experience up to 20% of any experience requirement. Based on the current 6000-hour requirement, I would be supportive of any Pro Bono time counted up to a maximum of 1200-hours.
Chuck	Landgraf	6000-hour requirement is too much
Cristian	Landry	500 seems low comparatively.
Jamie	Lapin	If the Pro Bono work actually involves learning, this is reasonable. If it is something from which the student will have limited to no planning-focused learning, it should not count. There should be a means of determining whether the Pro Bono work is actually a source of learning for the student. Marketing for CFP events, name taking back-of-room or some other activity for the benefit of the employer /internship firm which is not learning based, etc will be a waste of time with no educational benefit.
James	Larson	Agreed. Pro bono is legitimate work as long as it's not teaching math to elementary and middle school children. The pro bono work should be with adults whom are in need referred to CFP apprentices through for example family financial counseling centers.
Daniel	Lash	Since it is just a fraction of the time required this is fine but the level of planning that may occur in pro bono work can vary significantly.
Laura	LaTourette	yes!
John	Layug	I like this
Danielle	LeChard	Agree.
Kristen	LeClair	Pro bono experience does not necessarily conflate with experience that would be applicable to the CFP designation.
Sandra	Lee	Hopefully this will increase the number of planners offering Pro Bono services
Michael	Legge	As long as the experience is qualified and recorded, then yes. I would try and approach this experience by partnering with firms that contain junior advisors requiring the experience.
David W	Lentz	This seems appropriate to me.
Michael	Lewis	that's great to include, but why a limit on the maximum?
Rachel	Lewis	There should be no limit on the number of Pro Bono experience hours that count. The CFP board should support pro bono financial planning as there is a massive need for it, and it is good for the profession. I don't really understand why it matters if it is paid work or not.
Nan	Li	This motivates CFP certificants to give back to communities.
Darren	Liberski	As long as the Pro Bono work can be verifiable and shown to be useful.
Dante	Liberti	It is good to promote pro bono work
Jason	Light	Pro Bono work covering the personal financial planning process should count equally to compensated work.
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

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		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.
Guo	Liu	I think the more opportunities that planners get exposed to the value of pro bono planning, the better.
Chad	Lively	I believe candidates should have to have very real and genuine hands on Financial Planning experience. Volunteer Work is great and can be similar to real work experience, but from what I've seen, it's simply not scrutinized and held to the same standards that real work experience often is.
Kimberli	Lo	Worthwhile if the pro bono work is demonstrably meaningful. i.e. I would not consider volunteering for financial literacy for children's programs as experience that should count towards the hours. I have volunteered for those programs personally and while it is meaningful and important work, but it is not at the level of knowledge and expertise that should be counted towards pro bono hours.
Noah	Londer	I agree.
Paulo	Lopes	I support the proposal to allow candidates to count up to 500 hours of pro bono experience toward the 6,000-hour requirement in the Standard Pathway. Pro bono financial planning provides valuable hands-on experience while expanding access to quality financial advice for underserved communities. This change strikes a fair balance—encouraging candidates to give back while ensuring the majority of their experience comes from professional practice. It also reinforces the CFP Board's commitment to ethical and responsible financial planning.
Susan	Lopez	N/A
Eileen	Loustau	I personally do not think this should count towards experience since there is no way anyone could vouch for the quality of work provided
Alicia	Love	I'm not familiar enough with pro bono work to have any opinion
Kristina	Love	Having more than one avenue to obtain this certification is good. Not everyone works the same.
David	Lowe	This is an excellent way to give candidates practical experience in actual financial planning, while also benefiting the public.
April	Lowery	Experience required
John	Loyd	While I think almost all are in favor of encouraging pro bono work, an issue here is how to monitor the hours. Many charitable endeavors I have done (even in the name of 'financial planning') often involve hours and hours of administrative work. If one does 10 hours of pro bono work, but 4 of those hours are training, background checks, paperwork, etc., do you provide 10 hours?
Alejandro	Lozano	not immediately clear what this is.
Matthew	Lugar	support
Timothy	Lux	Support with the caveat that a currently certified CFP professional is overseeing/mentoring the potential candidate and is willing to sign off on the Pro Bono hours earned under their guidance.

First name	Last name (c/o firm name, if applicable)	Response
Drew	Magll	It should not be limited to 500 hours. Given the state of financial illiteracy, the CFP board should be encouraging much more pro bono work among candidates. Much of the pro bono work will benefit those without financial means, who benefit more from the basics that candidates can provide (vs those who have the mark). And, candidates are more likely to provide pro bono support than CFP® professionals. Suggest increasing the maximum to 1500 or more hours.
DJ	Mahler	No opinion
Bonnie	Maize	There is a significant lack of pro bono work in our profession compared to other professions, such as attorneys and physicians. There is so much pro bono work that can be done and it will also help promote our profession and establish a strong reputation for the marks.
Marco	Maldonado	Pro Bono experience exposes CFP candidates to a wide range of financial situations, however, always under the supervision of someone (CFP) that is well versed in that particular context and/or area.
Stephanie	Malewski	Pro Bono work is typically limited to General Principles (based on experience with pro bono work.)
Mason	Malozzi	I have never done Pro-Bono so I cannot comment but will agree with the CFP board
Josh	Mancell	I think 3 to 1 is too much however. I don't see how actively assisting someone with the planning process from top to bottom for essentially a whole day should be 2/3rds less important than sitting in an ethics lecture for 3 hours.
David	Mannaioni	Often younger CFP candidates or professionals need this to help attain the experience requirement and pro bono planning is a great way to do that.
Joseph	Manno	Pro Bono work experience should be viewed the same as paid experience.
John	Marchand	Please see the previous answer. Not only do I strongly support this I'd like to see it increased to more than 500 hours, circa 1000 hours Pro Bono or more. Again, given that I'm several weeks from turning 64 and newly retired I'm talking my book. However, I suspect that there will be an increase in degree candidates similar to myself and while I do not wish to minimize the educational rigor of the CFP education and exam process, for people in my position the concern is of course qualification hours. (Yes, of course I can go - and will do so - take the SIE and the Series 65 and hang out a shingle but I'd like to get some experience working for a fee only RIA and the degree helps. Having a clear path to obtaining the hours helps me and others.).
Carey	Markoe	Makes great sense & helps the community!
David	Marotta	Self-reported comprehensive financial planning is better than professional investment-only management divorced from comprehensive financial planning.
Kenneth	Marshall	CFP Board should provide networks to facilitate pro bono work.
Sheri	Marshall	Based on proposed, there would at least 2.5 years of experience in personal financial planning process and 0.5 years in an unpaid or uncompensated (i.e. pro bono) capacity (possibly an internship? with supervision?).
Bruce	Martin	Pro Bono work should be supported and encouraged - rewarding it will do just that.

First name	Last name (c/o firm name, if applicable)	Response
Paul	Martin	Pro-Bono work can vary tremendously depending on the individual, direct work experience is most important. If a candidate is simply helping someone budget, or take basic steps toward good financial decisions I don't think that suffices for CFP experience.
Barbara	Martinez	As a financial coach and AFC, I have seen firsthand how pro bono financial guidance can significantly affect people's financial stability, helping them avoid costly mistakes, build wealth, and gain confidence in managing their finances.
Mitchell	Mass	The knowledge we accumulate in this certification and others is extremely impactful. There is just as much effort and intelligence required for Pro Bono work as paid for advice and the people who are willing to give time back to those in need should not be restricted in ANY WAY.
Kevin	Matthews	I work for a veterans organization doing pro bono work and I have a huge belief that not only should pro bono work be allowed for certification, but it should be allowed for the CPE requirement. Furthermore, a website based report of pro bono hours logged (gross and net per person) based on firm size would be a good thing. Lawyers do this, why not us?
Christy	Matzen	Love more pro-bono work
Rick	Mayo	I don't get it, one has nothing to do with the other. Pro Bono and time facing actual clients are not the same thing. These can be submitted together without replacing requirements
John	McAvoy	Pro Bono work should be strongly recognized as an important part of the competency standards.
Jeffrey	McClure	Pro Bono experience is a key part of the professional image we need to see to be respected by members of the public.
Elizabeth	McCollum	Some hours of pro bono support should be counted, but given other avenues of non-direct avenues of working with clients that are already available, this could add a lot to non-compensated planning work, which I think is more valuable. Perhaps 200 is a better number.
Steve	McConnell	The key point about experience is whether it's a relevant indication of the CFP® professional's competence. Whether that experience has been paid or unpaid seems irrelevant.
Jack	McCormick	I think this can be a win for all parties involved those providing the financial help and those receiving it. The board incentivizing Pro Bono experience I think is a good thing overall.
Kyle	McCune	I think this will help our industry adapt and look 'down market' a bit to help those in need. I think this needs to be supervised pro bono experience to prevent untrained/unexperienced individuals from giving bad advice.
Justin	McCurdy	Sure - if it is validated/verified in a similar manner as the rest of the hours.
Jessica	McDonald	The problem with this, is that I have found most Pro-Bono work is not supervised for accuracy. We need candidates to have their work & advice reviewed to maintain the level of accuracy & expertise the CFP Professional holds.
Jude	McDonough	I think it will be difficult to document pro bono experience and the validity of it could be questionable.

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Catherine	McDougall	I'm not really understanding this. Are you wanting to limit the amount of free personal financial planning that a candidate can use towards their professional experience. I am for a more stringent reporting and review process of one's professional experience. As I said in the previous comment area currently it seems to me that professional experience is based off an honor system from candidates. Does the board ever reach out to the supervisor or review logs of candidates? I realize the manpower would be intense, but currently I feel professional experience is based on a candidate reporting ethically their experience. My perception is the board is not verifying this experience. There is really no point on having it, if no one is checking. What the saying trust but verify.
Ryan	McGhee	Absolutely. It supports pro bono activities and it's a great source of first hand experience.
Thomas	McGrath	I'm mixed on this one, I understand wanting to bring pro bono into the equation, typically to an underserved population, however I do not feel this should be included to obtain the marks.
Alan	McGrew	Quality Pro Bono experience can be an extremely useful component of gaining needed financial planning skills. More difficult for the Board to validate.
Aidan	McGuire	Pro bono work is just as beneficial to the experience aspect as paid work
Tricia	McIntosh	As stated earlier regarding experience that addresses at least three steps in the financial-planning process, allowing candidates for CFP Certification to count up to 500 hours of Pro Bono experience under the tutelage of a certificated CFP would be valuable.
Ben	McLintock	While I am a believer and support the intent and purpose of providing pro bono services to the community, I do not think this work should count towards qualifying to become a candidate for earning the CFP. It has been my observation when reviewing paid work versus pro bono work that there is sometimes, but not always, a difference in the quality and thoroughness of pro bono work product in comparison to the paid work. I believe every CFP should provide pro bono services, whenever possible. But that work should not count towards meeting the experience competency standard.
Jared	McNee	Seems kind of overly complicated to add this. Also, seems easy to falsify these hours with no verification.
Arianne	McSellers	As a career changer who worked in HR while volunteering as a financial coach for 10 years and now transitioning to the financial planning industry, it would help greatly if those hours were counted. I have done the work of helping many families pay off debt and create savings plans, but because they were not under the guidance of an approved attestor, those hours don't currently count which is a shame.
Kiernen	McTaggart-Ivezic	Pro Bono work helps the community and hones the skills of a CFP candidate, a win win.
Jonathon	Merickel	Pro Bono work is great as long as the organizations are selected and/or audited by the CFP Board



# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

First name	Last name (c/o firm name, if applicable)	Response
Greta	Messarra Woodward	As an active Financial Advisor for over 20 years, I easily accumulate over 10 hours per week of non-paid advising so I am curious how they would qualify this metric. Yes I am gradually adding more fee-based advising as well.
Christine	Messmer	Leave as is...
Alison	Mewborne	Most pro bono is unsupervised and hard to verify. AND widely applied.
Cynthia	Meyer	I like how this proposed change encourages CFP professionals to incorporate pro bono service from the beginning of their careers. It's a great way to serve all types of consumers, not just the affluent or wealthy.
David	Middleton	I suggest 800.
Maureen	Miller	Pro bono experience should be very supervised - will this be difficult to implement?
Michael	Miller	Pro Bono work typically is more about common sense advice, not CFP Professional level.
Rodd	Miller	If this is suggesting that an unpaid internship time should count, then I support it. But 500 hours of Pro Bono experience is only valuable to the extent that they are learning from someone else. The 6,000 hours is really the apprenticeship period where supervision and instruction add necessary learning experiences.
Ronald	Mims	N/a
Michelle	Minisci	I do not think the definition of of what type of pro-bono or how to record and prove these hours is conducive to keeping the costs low for renewals of CFP and demonstrating to the public the expertise of a CFP
Michael	Montante	STOP undermining our value by giving away our service. ProBono means not worth much. It is a horrible business practice. It is hard enough to make a living as a CFP to start with. Sell the fiduciary standard, not you can get our services Pro- Bono.
Hannah	Moore	I strongly support this change to the standards. Pro bono financial planning provides hands-on experience that directly builds the critical skills new financial planners need to be successful. We see this every day in our training programs. Pro bono requires professionals to apply technical knowledge, communicate complex financial concepts clearly, and engage in client-centered problem-solving—essential competencies for any CFP® professional. Additionally, working with pro bono clients helps develop active listening, empathy, and adaptability, which are crucial for delivering high-quality financial planning services in any setting. By recognizing pro bono experience, the CFP Board is reinforcing the importance of these skills while fostering a culture of service within the profession. However, I would encourage the CFP Board to clarify one specific item: who is required to sign off on pro bono hours? Specifically, must a CFP® professional verify the hours, or can another qualified individual (such as a supervisor or nonprofit organization leader) provide approval? Guiding who signs off on the experience will help aspiring CFP professionals and those who are helping them.
Kyle	Moore	I think encouragement of pro bono work is a conflict of interest and abusive towards CFP holders. I've held my tongue with the repeated email blasts about pro

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# CFP BOARD

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		bono work but this is getting out of hand. The truth is the board see's value in pro bono work because it provides leverage in the industry that you can tout this and guide free work where you desire on the backs of CFP holders. I will NEVER to CFP sanctioned pro bono work. I do pro bono when situations arise and its the right thing to do. That should be our prerogative and not encouraged by the CFP board.
Lisa	Moore	I think that would be a great added bonus to the competency standards.
Kristine	Morcos	There have been numerous times where prospects have received firm approved 'Personal Wealth Analysis' and were not onboarded. The real work is in the 6000-hours and the 500 hours would be double dipping. If someone is in it for the long game, than 500 hours to include in 6000 hours will not affect their candidacy, but will elongate the process for both CFP and candidates taking away from valuable admin, study, and experience time.
John	Morton	I'm not sure how capping pro bono hours at 500 helps either the candidate or to maintain the quality of the CFP designation. If anything, I would like to see CFP professions encouraged to do more pro bono work.
Ben	Mossoney	Pro bono work seems applicable experience
Caden	Mumford	This shows commitment to the CFP standards above just compensation, a drive to achieve if you will.
Kahlela	Mungin	None
Evan	Murphy	Pro bono work amongst our community is a fantastic way to earn and maintain the trust of the broader financial planning landscape
Jillian	Murray	I don't see any particular benefit to this move, especially if stricter limitations are imposed on the type of work experience accepted. I don't know if there's a crisis of brand strength or something, but limiting pro bono work just punishes and excludes people who are more passionate and generous, and who are working a lot harder than folks clocking in to make trades all day. Pro bono is either students or professionals volunteering their personal time to improve the lives of others. If someone accomplishes more than 500 hours of work in that way, they're an actual saint, why wouldn't you want that person even more?
Audrey	Myer	Pro Bono work might just consist of basic budgeting assistance and not the full breadth of knowledge needed to be a proficient CFP. I would lower the Pro Bono time frame to 100-250 hours maximum, not 500.
Lori	Nadglowski	I think this is a great way to gain experience but may be hard when employed since many firms don't allow pro bono work.
Shamiah	Naff	I don't think there is clear way to track pro bono hours. Who is supervising this?
Frank	Napolitano	I support the proposal subject to the requirement that the pro bono experience falls within the ambit of CFP professional experience (either the current rule or the proposed 3/7 rule)
Gregory	Nebel	On the positive, any experience in the early years is useful and Pro Bono would likely be on the simpler side and should help the less fortunate. On the negative if it is pandering to the image of the CFP organization to show we are charitable, then no.

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William	Nedza	While I support this proposal, how would a candidate show proof of their pro bono work, the actual hours, etc., and who would verify this work?
Devin	Neitzel	My opposition to this proposed change is also in tandem with the fact that I work in public accounting and am only allowed to record 40 hours per week toward my experience requirement. In total, since I have started working, I have worked over 700 hours that SHOULD qualify for the experience requirement, yet the CFP Board makes no exceptions and does not factor into consideration that other branches of the profession may work far more hours and gain experience quicker. For example, I work on a wealth management team that handles tax compliance, estate planning, business valuation, as well as other more generalized tax planning, business succession planning, employee benefits, etc., yet I am capped at the 40 hour mark. I am salaried and work between 40-60 for approximately 6 months out of the year and do not receive overtime compensation - under this proposed change, am I able to report and accumulate the 500 hours 'pro bono' that the current standards do not allow me to report?
Chris	Nelson	This is a great addition.
Dennis	Nelson	This is a nice gesture and could increase the Pro Bono services provided but I'm curious as to how these hours can be verified and documented appropriately.
Jack	Nelson	None
Jordan	Neuschwander	I agree pro-bono should count towards hours of experience as a way to better help educate others on finances and train CFP candidates.
Jeff	Nevlida	Experience hours should NOT be regulated Pro Bono or otherwise. More barriers to entry does not create 'better' certified candidates. How / if a financial planner chooses to be paid should be left to the candidate to decide.
Jacob	Newcomb	Good to cap Pro Bono Work. Wouldn't want someone to get the license without doing real work.
Ryan	Newman	It can be difficult to get pro-bono work approved by some employers for individuals who signed a non-competition agreement. For example, I work at Fidelity Investments and must pre-clear outside business activities. It is a 'threading of the needle' exercise to get any financial planning activities approved by my employer.
Vu	Nguyen	Na
Santine	Ngwe	I agree
Paramjit	Nijjar	There should be no upper limit on the number of hours one can gain from Pro Bono work. One may actually provide the best Financial Planning advice when there is zero money to be made. This invariably helps the people who need this type of help the most and may never get it otherwise.
Ilie	Nistor	great way to give back as well
Cady	North	This a great way to expose candidates to more real-world financial planning and do good in the process
John	Northrop	Not sure, from the experience point of view (6000 hours), does it matter if they are being compensated for the experience or not? Am I missing the point here? I also

First name	Last name (c/o firm name, if applicable)	Response
		think the pro-bono hours will be harder to prove and might shave half a year of experience off that could be very important. Specifically it would be the last six months of someone's experience and many of us learn the most important and difficult concepts later in our education path than earlier.
Johnny	Nuanes	Great way to earn experience hours
William	Oakland	Agreed
Bob	Obernesser	Must be verifiable
Celina	Ochoa	Outside of self-certification, there is no way to confirm that the candidate has met the hour requirements.
Anne	Oestrieher	As long as the probono work is supervised and properly documented. I would think this is a very slippery slope; very easy to fudge 'pro bono' work.
Kelli	Olsheski	I am not sure if the pro bono component matters as much, but I do support allowing pro bono hours to be attributable.
John	Oluwaleye	The standard pathway may be modified to require experience covering at least three steps of the financial planning process. The CFP Board's board of directors is seeking input on these and other proposed changes. The changes are intended to shape the future of the profession.
Daniel	O'Mealey	As with the prior question - this seems reasonable if the experience is verifiable and would be valuable to the CLIENT.
Michael	Oroszi	Many hours helping family friends that have significantly improved financial outcomes outside of a traditional / professional setting
Andrew	Oster (Triton Financial Group Inc)	Pro bono hours should be counted towards the experience requirement.
Thomas	Ouimette	I oppose it because CFP Board is going to have to add resources to track this, which will result it higher bi-annual fees to CFP certificants.
Olalani	Oyegbola	I believe up to 1500 pro bono experience hours should be allowed. In a year and time when employers are looking to cut costs, paid internships and side opportunities may be few. I would like to gain some experience while keeping my day job and working towards my CFP hours after work and on weekends. This way I will be able to save money from my current job and prepare for the staring salary of a CFP. I will also have some experience, which will hopefully, encourage employers to take my resume more seriously when I do officially transition over to the financial planning world full-time.
Jason	Palmer	Candidates should be apply significantly more Pro Bono hours, up to perhaps 75% or 4,000 of the 6,000 hours. Getting paid should be irrelevant. It is the doing of the work, interacting with the CFP process that is important. To support my statement, in the Accounting (CPA) profession. There are many firms that support the VITA (Volunteer Income Tax Preparation) Program with the IRS. These individuals may completely volunteer their time and/or may or may not be paid by the Firm for providing the VITA service to the Community. One still gets the experience of interacting with Individuals and the preparation of Tax Returns (and related guidance) REGARDLESS of if getting paid.

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Peter	Palmer	Pro bono is a commendable thing and there should be an added benefit.
Jonathan	Panning	Pro Bono hours should be kept completely separate.
Jonathan	Panzica	Pro Bono hours should count but 500 hours is a large proportion and this could be taken advantage of to get to the experience requirement quicker
John	Parrillo	Pro Bono will help Advisors understand the less privileged and see the reasons for financial failure.
Jeff	Pasternack	It's hard to do planning for people with no assets and who live check to check. As a tax professional, my pro bono work is solely related to tax.
Jammy	Pate	Non profit work is identical and we should not penalize those
Christian	Patterson	This could be beneficial to increase pro-bono work in the field. However, that type of work is likely not conducive to training good advisors in all aspects of financial planning since it is typically less in depth.
Jennifer	Patterson	There should be a cap to pro bono experience to ensure relevant real world experience and potentially higher complexity cases before being deemed able to provide unsupervised financial planning. The standard needs to be raised from 'some professional experience' to be more specific. Pro Bono is good but most likely will not provide sufficient experience for client cases in private practice.
Ross	Patterson	why limit pro bono experience? 6000 hours of pro bono is more worthy than 6000 hours other ways. I would love all cfp's to have had 6000 hours of pro bono experience where the clients interests are satisfied instead of non-probono experience. The industry should be about what is best for the client.
Adam	Peak	'Volunteering' is a great way to learn and grow. It also helps the community. I think that's all important.
Jason	Peck	Don't know how pro bono experience would count/be qualified or translate to actual experience.
Julia	Peloso-Barnes	I oppose the Proposed Change as written, but could support a modified change. While I see the benefit to multiple stakeholders of allowing Pro Bono hours to contribute to the Experience Standard for the Standard Pathway, I suggest including a requirement that these candidates attend a pro bono education course specific to the activities in which they want to receive credit for Pro Bono experience towards their 6000-hour Experience Requirement. Promoting Pro Bono activity without having a mechanism to reduce the risk of an inexperienced adviser making significant errors that could be more relatively damaging to a Pro Bono client because of their likely lack of financial sophistication.
Jessica	Perkins	The proposal to allow CFP candidates to report and accumulate up to 500 hours of pro bono experience toward the 6,000-hour requirement of the Standard Pathway is a forward-thinking and equitable change that reflects the growing need for accessible financial planning services. This adjustment not only aligns with the mission of the CFP Board to foster public confidence in the financial planning profession but also addresses the critical issue of financial planning accessibility for underserved populations. Excellent financial planning is often inaccessible to the majority of individuals and families. The complexity of managing finances, particularly in challenging economic climates, disproportionately affects low- and

First name	Last name (c/o firm name, if applicable)	Response
		<p>middle-income populations, who are often unable to afford the services of skilled financial planners. By incentivizing pro bono work, this change directly encourages aspiring CFP professionals to bridge this gap, offering much-needed support to individuals who might otherwise go without sound financial advice. These hours could be spent assisting families with budgeting, navigating debt repayment, understanding insurance needs, or planning for retirement—services that are life-changing for many. Pro bono work offers a unique and invaluable learning opportunity for CFP candidates. Working with diverse clients, often with limited resources, allows candidates to refine their skills in crafting creative and effective financial solutions. It challenges them to think critically, adapt their communication styles to different audiences, and develop empathy—key traits of a successful financial planner. Furthermore, the diversity of cases encountered during pro bono work ensures that candidates acquire a well-rounded experience, preparing them to serve a broad range of clients in their professional careers. The CFP Board's Code of Ethics emphasizes acting in the public's best interest and contributing to the betterment of society. By allowing pro bono hours to count toward the experience requirement, the CFP Board reinforces these principles, embedding a culture of service and community impact within the financial planning profession. This shift signals to candidates and the broader public that financial planners are committed not only to their clients but also to the greater good of society. Critics may argue that pro bono experience differs from traditional paid work and may not fully prepare candidates for real-world financial planning. However, the proposal's cap of 500 hours—just over 8% of the 6,000-hour requirement—ensures that the majority of a candidate's experience remains rooted in professional, supervised practice. This balance maintains the rigor of the CFP certification process while recognizing the value of pro bono service as a supplementary component of professional development. Integrating pro bono work into the certification process could also inspire more CFP professionals to continue such service throughout their careers, creating a ripple effect of accessibility. Candidates who engage in pro bono work early in their careers are more likely to see its value and incorporate it into their professional ethos. Over time, this cultural shift could help the financial planning profession extend its reach to previously underserved communities, enhancing its reputation as an inclusive and socially responsible field. Conclusion Allowing CFP candidates to count up to 500 hours of pro bono work toward their experience requirement is a meaningful and practical step toward addressing the inequities in financial planning access. It incentivizes service, enriches candidates' learning experiences, upholds the CFP Board's ethical commitments, and strengthens the profession's societal impact. By adopting this change, the CFP Board would not only reinforce its dedication to public service but also inspire a new generation of financial planners to prioritize accessibility and inclusivity in their practices.</p>
Trent	Perry	Yes, I agree with the planning experience requirement



First name	Last name (c/o firm name, if applicable)	Response
Kris	Persinger	This makes no sense. Providing pro bono is the same as practicing. This time should not be double counted
Kenneth	Peterson	Over which time period?
Michael	Peterson	Pro bono work is just fine
Zulma	Petty	Need more information on how Pro Bono hours would be qualified.
Cindy	Phelan	All the better for CFP candidates to use their knowledge to help others. 6000 hour requirement is extremely rigorous, and by providing credit for pro bono work, the candidates will have incentives to give of themselves to those in need.
Russel	Phelps	I would support allowing the candidate to use pro bono hours, but not mandating that they provide pro bono hours.
Zach	Pidgeon	Pro Bono is a great way to add experience
Jennifer	Pietka	Again I think this can be stretched to say someone has experience without real life studies
Susan	Pilon	Pro Bono should be celebrated.
Daniel	Pinard	Pro bono should not qualify unless there is a mechanism for evaluating the effectiveness of the service provided. Incompetence in employment will get you fired, pro bono doesn't have that mechanism.
Natalie	Pine	Someone with no experience should not be providing advice.
Matthew	Platt	Encouraging pro bono work is a good change.
Kevin	Podell	It can be challenging for newer industry professionals to find opportunities to gain experience so I feel allowing for Pro Bono hours to count towards the experience requirement provides greater opportunities.
April	Pollard	My concern would be oversight of these Pro Bono hours toward the expertise in alignment with the CFP® certification.
James	Pontious	This is just not needed. I have been licensed since 1996 and would never been able to provide 500 hours of pro bono work while just starting out and raising a family. This is not realistic.
Susan	Pool	I do not think that encouraging Pro Bono work by offering a carrot on a stick creates a good experience for those who are to benefit from the efforts of the candidate. While I cannot judge the motivation of others, helping to 'check a box' rarely affords a good experience for those being helped. Volunteerism should come from the heart and not because an 'incentive' is offered. I do A LOT of work as a board member, volunteer and helper in our community, but it isn't Pro Bono work in the context of my CFP. It would be a shame to incent the outcome without regard for the experience of the beneficiary.
James	Powell	Pro Bono experience is still experience - with perhaps an even greater impact, if helping people who normally would not receive such guidance.
John	Power	Under the supervision of an accredited CFP professional this provides tremendous learning opportunities for the candidate. It also pushes the candidate to move beyond the investment or insurance-centric approach of many firms.
Hunter	Prasch	This just aids potentials candidates by allowing flexible ways to get their experience requirement.



# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

First name	Last name (c/o firm name, if applicable)	Response
Jacqueline	Price	I have no objections
Jeffery	Price	this sounds reasonable
Bryan	Purdum	I don't feel I fully understand the different sides of this debate to have an educated opinion on the subject.
Cassandra	Queen	Pro Bono cases can be the hardest cases to serve, providing a great deal of compassion in this industry. I would say that the 500 hours must be supervised.
Kevin	Rackers	Not to say that Pro Bono work isn't worthy, the type of clients you help in that space are not always indicative of what true holistic financial planning usually requires of clients of more means. I agree with the 500 hour max, maybe 600 tops (10% of the total required).
Peter	Rafaniello	I work within a community bank and which, at times, requires me to work pro bono by educating bank customers on financial basics.
Liz	Raleigh	I don't understand the reasoning behind this proposal. For candidates like myself with a full-time career outside of finance and are pursuing the certification on the side, being able to accrue some pro-bono work is one of the only viable pathways to the 6000 threshold. As long as the work is supervised -- as is already required -- I do not understand the hesitancy around it.
David	Raney	Knowledge of the field, hands on experience is important.
Andrew	Rasmussen	You can't make it in this business doing a bunch of pro bono work
Alan	Ray	I am not familiar with this 6000-hours or the Standard Pathway. But as I said above, the substance of experience is what's important. Compensation is not necessarily pertinent.
Robert	Reay	So long as the Pro Bono experience is relevant to financial planning (i.e. involves 3 of the 7 steps), then I support this proposal.
Michelle	Redding	I am not certain what the pro-bono experience would look like. If it's a relatively small number of the overall hours required, it could make sense. More details are needed.
Alyssa	Reed	This is a great way to incentivize pro bono work and rewards those who are giving back.
Michael	Reed	Not sure Pro Bono experience is going to expose the candidate to a diverse client experience. Much of Pro-Bono may be budgeting or insurance related.
Bryan	Regalado	Ability for individuals to gain experience and incentive volunteering.
Daniel	Rendler	We should not have to provide Pro Bono experience or care. It is hard enough running a business. Most of our work and meetings go unpaid anyways.
Kelly	Renner	Would they have supervision of some type? I think this is a wonderful idea, but would want the advice to be monitored.
Chad	Reynolds	10% seems more reasonable
Jacob	Rhodes	No opinion
Loredana	Rickard	I support this proposed change.
Michael	Riendeau	I would support a higher maximum. It is my opinion that a lot of experience can be earned through unpaid, pro-bono or internship opportunities.

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First name	Last name (c/o firm name, if applicable)	Response
Zach	Riffett	I don't mind this because you still have to commit to a significant amount of non pro bono hours.
Jonathan	Ritter	The experience requirement ensures that candidates develop practical, hands-on skills in a professional environment under the supervision of experienced professionals. Pro bono work, while valuable, may not always provide the structured, supervised experience necessary to build competency. Allowing pro bono hours to count risks diluting the standard of professionalism expected of CFP® certificants. Pro bono work also often lacks the same level of oversight, compliance, and accountability as professional work in a formal financial planning setting. This could result in candidates gaining experience in an unstructured or inconsistent manner, which may not adequately prepare them for the responsibilities of being a CFP® professional.
Otto	Rivera	Based on my personal experience, I strongly support the proposed change to allow candidates to report and accumulate up to 500 hours of Pro Bono experience toward the 6,000-hour requirement of the Standard Pathway. This change acknowledges the valuable contributions candidates make through Pro Bono work while also providing them with meaningful opportunities to apply their financial planning knowledge in real-world settings. Working with Pro Bono clients exposes CFP candidates to real-life financial planning situations, helping them develop critical problem-solving skills. Unlike theoretical coursework, direct client interactions challenge candidates to assess complex financial issues, adapt their approach, and develop solutions for unique circumstances, many of which may not be commonly encountered in paid financial planning settings. Additionally, Pro Bono experience offers candidates a hands-on, experiential approach to learning financial planning. Concepts taught in coursework take on new meaning when applied to real individuals facing diverse financial challenges, reinforcing practical knowledge in a way that textbooks alone cannot. Beyond technical expertise, Pro Bono work helps candidates refine their communication skills that are an essential component of effective financial planning. Through active listening, empathy, and thoughtful questioning, candidates learn how to build trust and rapport with clients. These interactions teach them to explain complex financial concepts in an accessible and relatable way, ensuring clients fully understand their options and can make informed decisions. Furthermore, engaging in Pro Bono financial planning fosters a spirit of collaboration between candidates and their clients, emphasizing teamwork, guidance, and shared problem-solving. By incorporating Pro Bono hours into the Standard Pathway, this proposal not only strengthens the training of future CFP professionals but also promotes financial literacy and expands access to financial guidance for underserved communities. I urge decision-makers to approve this important change, as it enhances both the profession and the public good.
Jody	Robinson	I like this opportunity for people to gain experience.
Thomas	Robinson	I would support more hours of pro bono work towards experience as long as they have the majority in non-pro bono experience.

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Blake	Robson	Pro-bono work should count towards experience.
Dylan	Roche	Sounds good to me!
Jason	Romano	This does not seem in line with our industry standards and I don't see firms allowing for such a thing.
Robert	Ross	I like the additional encouragement to provide Pro Bono service.
David	Rowland	This is fine.
Marsha	Rubin	I prefer separation of 'church' and 'state' - i.e. If someone is charitably inclined, they will do pro bono work. In trying to force the issue, we may end up with the opposite outcome of what you are aiming for - unscrupulous people trying to game the system and making us look bad with the very people we are trying to help. I know of no other profession that gives 'credit' for pro bono work. Pro bono is pro bono and should come from the heart.
Patricia Ann	Rudy-Baese	Sets an expectation of and experience in pro bono work which is a part of our ethical responsibility, in my opinion.
Michael	Rundlett	I support this if most of the steps to the financial planning process are part of the experience. Maybe not all seven as pro bono clients may not have the means for all seven steps to be applicable.
Jonathan	Russell	I don't think the lack of compensation negates the legitimacy of the experience, so I don't think pro bono hours should be rejected prima facie, though they might require closer inspection.
Chris	Russo	Not sure why there should be a maximum number of hours, but some guidelines are acceptable to me.
Michael	Ruzhansky	How will this be tracked?
Gary	Rychtanek	It's possible that experience is met through probate Bono work though I'd prefer this is not allowed.
Brigid	Rypien	Yes! I think this is good for the brand
Joseph	Sachetta	I'm not totally familiar with what qualifies for Pro Bono experience. If it involves traditional financial planning, I would support this proposed change.
Siegfried	Saftner	I see no issue with this so long as the work is of acceptable quality.
dennis	sakurai	How are you going to monitor Pro Bono experience? Calls to Pro Bono companies for verification.
David	Salehi	Why are we putting more limitations on the hours requirement? 6000 hours already seems excessive on its own.
Melissa	Sanchez	Pro bono experience is still experience.
Laura	Satin	I don't know what number of hours should be the right amount, but certainly, a number of Pro Bono hours helps candidates and sends a great message to our communities that our profession doesn't need to insist on payment in every case. It's very difficult as it is for potential clients to distinguish competent, ethical financial service providers from those with an aggressively-positioned product-led, sales-led environment. It must be acknowledged, however, that anytime a dollar changes hands between people, there is a potential conflict of interest, so that even fee-only planners cannot automatically claim a higher level of integrity

First name	Last name (c/o firm name, if applicable)	Response
		or fiduciary responsibility than someone on commission. And those on commission may be perfectly aligned with the client if it's based on an AUM fee or based on a 'product agnostic' compensation grid that doesn't provide higher rewards for one type of product versus another. I realize the question was about Pro Bono experience, but I think the question has to consider the long history of the industry being commission based before we can think properly about the answer.
Margery	Schiller	This is reasonable since pro bono work is encouraged for all CFPs. However, the topics addressed in most pro bono work links to budgeting and credit/debt management. While these are part of the personal financial planning process, they are not as common topics for those who have saved toward their future needs and want guidance in other areas.
Kurt	Schindler	Will this be the same as for CE (3 hours of pro bono = 1 hour of CE)?
James	Schless	No real way to validate.
Jacquelyn	Schmidt	Pro Bono should not be allowed.
William	Schretter	That is 8% of the time requirement. I think that is reasonable. The pro-bono experience is excellent for training purposes.
Nichole	Schurr	Seems that 'pro bono planning' is experience just like any other experience.
Byrke	Sestok	Practicing financial planning with those who likely need it most is a terrific idea.
Viney	Sethy	Why Pro Bono hours? Quite frankly I don't understand the relevance of Pro Bono hours.
Renee	Sewall	Good way to promote pro bono work
William	Shafransky	Support, however there must be a standardize process for tracking these hours. Whoever signs off on them should be required to sign a legal document and be liable for fraud if they are deceptive.
Amy	Sharp	This will help set the stage for more pro bono work after certification/
Cameron	Sharpe	I think that relevant volunteer work is beneficial practical experience.
Jeff	Sherman	I think it's important that a CFP practitioner have some actual experience in financial planning. This gives more credit to the CFP certification.
Mark	Sherno	pro bono work must parallel CFP course study
Daniel	Shevlin	I think you water down the designation by giving it to too many people who don't actually practice and just use it as a marketing tool for their large organization
Matthew	Shirley	This makes sense. The experience is the work, doesn't matter if you were paid.
James	Short	I support a simple pathway- similar to the CFA designation.
James	Sias	More is better
Aissatou	Sidime-Blanton	The value of the hours is in going through the planning process with real people and learning to listen, read verbal and non-verbal cues, extract pertinent information and provide options/guidance - not in whether the service is paid.
Phyllis	Silverstein	500 hours Pro Bono experience in what profession? I came from the nonprofit sector where I ran the Foundation/Endowment department. I did not have any ability to provide Pro Bono services. Now I work for a bank and run a division for the trust department. Working for a bank, we are not allowed pro bono hours

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

First name	Last name (c/o firm name, if applicable)	Response
		doing what we do professionally. So, financial or wealth planning would not be allowed.
Tyler	Simonds	I do not believe that the pro bono experience properly substitutes a portion of the Standard Pathway. Pro Bono should count for current CFP Registrants only
Joy	Slabaugh	Love this
Austin	Smith	Yes as that makes it easier to satisfy the requirement
Christopher	Smith	Most planners do their planning for free anyway. Capping the amount of pro bono work at 500/6000 hours seems unreasonable in light of this fact.
Garrett	Smith	Granting experience credit for Pro Bono financial planning would be a good change because it would incentivize more Pro Bono planning and help individuals who cannot afford to pay for planning services (who often need the help more than those who can afford it). I do not see any compelling reason why Pro Bono financial planning is worse experience than paid financial planning.
James	Smith	This is a personal choice
Roger	Smith	None
Scott	Smith	I do not have a strong position about this either way.
Ted	Snow	People want to live balanced lives and to heap more hours on them away from their families is a lot to ask. Why not have it as part of the 6000 hours instead of adding more hours? Experience will come in the right setting.
Justin	Snowden	I am assuming that this experience is reflective of the typical work of CFP professionals. If so, then pro-bono work is important.
Hamilton	Soriano	Support
Fred	Soule	Pro Bono experience can be problematic
William	Stade	I believe what you are saying here is that the 500 hours of Pro Bono counts towards the 6000 hours.
Albert	Stanton	As long as the work is aligned to financial planning, see no reason why some of those hours shouldn't count.
Jael	Stebbins	Pro Bono work can be meaningful and impactful in our communities.
Adam	Stempel	Fine for the candidate, is this the best thing for the pro bono client?
Laura	Stern	Pro Bono is just not the same as working with clients who pay for services.
Andy	Stevens	CFPs should be familiar with all aspects of planning to include experience with emotionally navigating planning engagements that include potential compensatory recommendations.
Deann	Stevens	Planning and advising work is all the same whether compensated or not. Pro Bono work that is substantially equivalent to compensated work should count. You can currently get 500 hours by attending one of the externship programs why would pro Bono be any different. Just establish the right criteria around what type of pro Bono work qualifies.
Matthew	Stewart	Makes sense to allow one to use pro-bono hours toward the experience requirement.
Eric	Strom	I oppose this as there is a potential for it to be manipulated by applicants.

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Bryan	Strong	I believe pro bono work is important, and I believe being paid while gaining experience causes the candidate to be much more thorough in his/her work
Cherie	Stuece	I believe in pro bono work, but 500 hours is significant for an entry-level professional to give up as part of their 6000-hour requirement. As the CFP Board works to expand their reach across diverse potential professionals, the nonpaid work could have significant impact. As someone that does pro bono work as often as possible, and that mentors AFC candidates seeking pro bono outlets, the 500 hours is a significant requirement. Also: If this is required of candidates, then a similar pro-rata (500/3 years = 167 hours per year) should be required to hold the certification. I do not believe many CFP(R) professionals would want to give up 167 hours a year for pro bono work either. I don't think many professionals even have that capacity. Another problem with pro bono is the current requirements of who is allowed to attest to pro bono work for experience hours. A current candidate has measured pro bono work but not under a CFP(R) professional (but under another national, rigorous credential) - and needed a waiver to accept. I don't agree with pro bono requirements of a candidate without pro bono of the professional (lead by example, ask no more of a candidate than the professional). I also think the standards to accept pro bono work as experience needs to be reviewed for all current candidates wanting credit for their hours. The best and more impactful pro bono outlets will not have a CFP(R) professional to supervise.
Michael	Sullivan	Pro Bono experience can be legitimate experience. I would support a change that requires a heightened level of scrutiny of management for Pro Bono work, since it's less likely to have been done under regulated supervision.
Alex	Sutherland	Working for pay or working for free should have no bearing on the experience requirement. As long as it's verifiable, it should count.
Charles	Swanson	The problem with the 6,000 requirement won't be fixed with a 500 hour Pro Bono credit. This relief won't attract many individuals who already have extensive financial experience but do not intend to work in an understudy role for 6,000 hours.
Anastasia	Taber	500 out of 6000 hours seems reasonable and a good idea to help underserved communities.
Jason	Tafoya	This would be a nightmare to prove.
John	Talleur	No opinion.
Landon	Tan	I think pro bono should be able to count for all of the hours.
Christopher	Tarashuk	This would allow people who likely would not have the net worth necessary to become clients to receive CFP support (even if it is just a basic plan). These are often the people who could use our support the most. I believe this encourages the use of CFPs as they (hopefully) rise through tax brackets.
Christopher	Tasik	I would support the pro bono after they have reached the 3000 hour mark. It seems to me we are sending people to do pro bono work who are not qualified to do such work.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

First name	Last name (c/o firm name, if applicable)	Response
Don	Taylor	Allowing the candidate to count 500 hours of Pro Bono experience is only 8 1/3 percent of the total professional experience requirement, and encourages financial professionals to do Pro Bono work.
Josh	Taylor	Maybe. If someone is early in their career and struggling to survive financial (and this is very common) this only adds to their burden. Be careful on how difficult you make for people to enter the profession.
Travis	Taylor	This seems reasonable. We should have people practicing with paying clients who are their most likely clients. We don't want a situation where experience requirements are not reflective of the profession.
Victor	Tedesco	Sounds reasonable
Douglas	Tees	I think pro-bono is a great way to build experience and give back to the community at the same time.
Alexander	Theodore	Pro Bono work would be an excellent way to gain practical experience and assist the under-served.
Andrew	Thibeault	experience is experience, pro bono or not, its still experience
John	Thomas	Not sure an unlicensed person should be giving pro bono advise.
Karrie	Thomas	Support the pro bono hours as long as it is supervised under a CFP professional.
Kevin	Thompson	Many of the new entrants are likely providing no cost advice to peers. Should be counted, but needs to be formally kept in books and records
Lynn	Tramontano	Agreed
Lee	Trevino	I don't believe you'll be able to accurately track the 500 hours of pro bono work.
Patrick	Trimp	See earlier comments
Cary	Tucker	I oppose the proposal that pro bono experience could count towards the experience requirement unless there are specific requirements or standards (or an approval process) for the pro bono work to qualify for the experience requirements of the CFP Board. I have volunteered at numerous Financial Planning Day events where aspiring financial planners have an opportunity to observe or 'shadow' a CFP® at work with a Planning Day client. I have no objections to the practice, and I hope that the opportunity will continue for individuals working towards becoming a CFP® having a chance to observe an experienced CFP® in a discussions with clients at pro bono events. However, I must question whether quietly watching a CFP® communicating with a client should really count towards the experience requirement of the standard pathway.
Nicholas	Tupaj	I support this measure. Pro-Bono work benefits the communities that the candidate is likely going to work within, giving them positive exposure.
Jeff	Turton	With pro bono work you are often just helping people with debt, budgeting etc. I don't believe these hours give experience that helps an advisors work with an average client
Rob	Typher	See previous comments.
Joseph	Ullrich	I would have to know more about
Inderdeep Singh	Uppal	Its very important to not forget the community and per helpful to the ones that are in need. Pro bono work.helps in giving back to.the community

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Tamara	Uribe	As they are studying for the CFP, would pro-bono work be monitored? Would they identify as having a CFP? Would they be held to the same fiduciary standard as a CFP?
Adam	Van Deusen	While I strongly support pro bono planning work, I think this change would have very little practical effect for candidates. First, many (most?) pro bono opportunities require CFP certification to participate, so many doors will be closed off to candidates. Second, it is very hard to build up a significant number of pro bono hours (2 hours/week would only get an individual ~100 hours per year, the equivalent of only 2.5 weeks of full-time employment (that likely involves much less client-facing work!). An improved approach would be to offer a multiplier for hours of client-facing pro bono service. In the example above, 2 hours/week of pro bono service would be much more impactful if they were say, multiplied by 10 (resulting in 1,000 hours of credit for the year).
Brendan	Van Egeren	Love expanding the hours to give back to those who need help the most!
Hannah	Varnado	This can be an important way of completing this task. I had provided pro bono hours that could not count toward mine.
Cristal	Vernon	Na
Andrew	Vidal	Pro Bono hours do good for the local community and for the brand recognition of CFP professionals.
Gregory	Virant	As long as pro-bono work is focused on financial planning (like the previous proposed change for 3 of the 7 steps of financial planning).
Solon	Vlasto	So this then means there would be candidates providing some kind of planning when they are not experienced enough to meet the experience requirement? Would the work be supervised? I fully endorse giving the planning community another incentive to provide Pro Bono work but not as candidates unless they were supervised. I don't beleive that can be done effectively.
David	Voth	Any financial experience should count irregardless if it is paid or oro bono work
Kyle	Walchli	Na
Bryce	Wallace	I think adding more options outside of the work place to attain more experience hours is a great thing.
Zach	Wallace	No comment
Jennefer	Walsh	Strongly Support, however, I do think that there needs to be a clear definition for what qualifies as 'Pro Bono'.
Lori	Walters	This encourages investing in the community and assists those who otherwise may not have had access to this level of financial expertise.
Nickolas	Wann	Pro Bono work should not be a requirement. When I was a young professional, I was the sole income earner of my family and would not have been able to afford this. I simply wouldn't be a CFP is this was an initial requirement. While I believe charity / Pro Bono work is a good thing, to make someone give isn't really a gift at all. If you did 'force' someone to give their time it should not be 500 hours. That is a lot of precious time, away from family, that a person would have to sacrifice. I believe this barrier to entry is far too harsh.

# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

First name	Last name (c/o firm name, if applicable)	Response
Cody	Ward	I see how this has potential to work well.
Richard	Waters	Duplicate question?
Thomas	Watson	Not sure what the pros and cons are of this. Pro Bono experience is still experience as far as I'm concerned
Beth	Watts	This is an area that I had to get an exception to policy for. I would also like to add another designation to the 'attester' list. Currently the list includes CFP, ChFC, etc. I would like to add Accredited Financial Counselor (AFC) to this list. And AFC is able to supervise budgeting, debt repayment, credit counseling, etc which is what many people need with pro bono counseling. Adding the AFC designation to the list of attesters would speed the process of certifying the experience hours.
Saviez	Wazir	No opinion.
James	Weaver	Reporting can create fraud.
James	Webb	Good with this.
Lisa	Webb	How do you measure Pro Bono work?
Curt	Weil	It is high time the Board noted the value to the public of Pro Bono service and rewarded the effort.
Mark	Wells	As along is verifiable process of actual planning, yes.
Jerome	Wenner	Pro Bono work is Pro Bono work. Nothing is free. Not really. Everything has a price. Somethings are priceless, but not free. Strive to arrive. Pro Bono is just part of that within realm of volunteering your time, energy and talents to those less fortunate than yourself.
Katherena	Weyand	As some who believes strongly in the value of pro bono work, and who recognizes it as an opportunity to both serve an underserved population and enrich my own experience as a financial planner, I believe that making 500 potential hours of Pro Bono experience eligible to meet the requirements would be an excellent addition.
Learning	What	Not sure why some experience would count less. If it's bad experience don't count it otherwise I don't see why it should be limited. Pro Bono work is typically hard to accumulate IMO
Jack	Wheeler	As long as this is some part of professional financial planning, I don't see why this would be considered a bad or extremely beneficial item.
John W	Wheeler Jr	I question the pro-bono qualification if they aren't a CFP as far as the designation goes. It appears hard to determine.
Marian	White	Makes sense and gets them into the Pro Bono habit, something I regret that I never worked into my schedule.
Gaius	Whitfield	If the pro bono work is equivalent to the standard pathway, then I support the change. Otherwise, I am not sure that changes need to be made.
Christie	Whitney	Good for all, and provides well rounded experience for candidates, versus just working with the HNW folks they will likely focus on professionally.
Ryan	Will	Not sure how pro bono work is relevant to experience requirement.
Charles	Williams	The new requirement would place an unnecessary burden on candidates that is already addressed in the current standard.
Ronald	Williams	Good to start early- shows passion for career vs just the money

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# CFP BOARD

CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.

First name	Last name (c/o firm name, if applicable)	Response
Stephen	Wilmot	Pro Bono could easily have a very wide definition and would add another layer of regulation to people's lives that are already overwhelmed with forms and regulations.
Alexander	Winstead	This creates abstract reasoning to not get the certification. Pro bono experience is still experience and changing the limit of hours that can be submitted will reduce the number of individuals who will want to become accredited
Amanda	Wiscomb	How will pro-bono work be validated?
Todd	Wnuk	In my experience, Pro Bono work is limited in scope and breadth.
Christopher	Woodard	I totally agree with this update!
Loryn	Woodard	I think this should be combed out more. Family and friends have a tendency to take much of your time especially when you become a CFP. This could easily be done by going around to them and asking if they want a free financial plan. I also think in doing this we allow some bad actors to skate by on this rule. When clients pay a fee, it holds everyone accountable.
Tyler	Woodbrey	I would support this with added definitions of qualifying pro bono experience. Does all service count or only financial related service?
Mike	Woodham	I believe this is more of a restraint that bars otherwise qualified and highly capable individuals from gaining a pathway toward CFP certification. Brokerage firms are not going to take on individuals just to give them experience, and, most CFP's are highly doubtful to take in someone they do not know just to give this kind of practical experience. Additional educational requirements would be a better solution.
Leah	Woodly	Pro bono experience can be an excellent start for candidates. However, most pro bono work is limited to financial coaching and therefore would not provide candidates with the vast amount of experience necessary to be a competent Certified Financial Planner.
Mark	Woodruff	This makes sense. Question: How will the quality of pro bono work be measured.
Laurence	Wulker	It is fine to be a professional student but few of us can afford that luxury.
Kathy	York	I feel this requirement would be difficult for candidates who work full time. Most are working in a position that will satisfy the experience standard. I feel Pro Bono experience could be a part of the total requirement but should not be a requirement.
Stephen	Yoskowitz	Frankly, it should be up to 6000 hours of Pro Bono experience; why limit it? What benefit is there to limiting the number of hours?
Machaka	Young	No further comment
Z	Z	I strongly support making it easier to receive the marks in the sense of the experience hours. Make the education and testing harder but the experience easier to obtain.
Ian Zabel	Zabel	I have not done this in finance, but in my past sector, I worked for free to gain experience once as long as 90 days
Erica	Zacharie	Hopefully this will allow more pathways for CFP candidates switching career paths.

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

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Daria	Zalewska	I feel like this would be abused and candidates would count providing financial planning to their family and friends as part of this experience. There would be no way to verify if their advice was good. What kind of oversight would there be in this situation? Would would attest to this? I am not on board for this as counting towards experience, but I do support pro bono work as part of the continuing education requirement for CFPs.
Mark	Zeigler	Why on earth would you put a limit on pro bono experience hours? Why does it matter if you are being paid if you are gaining experience? Experience is experience.
Donald	Zolfo (Midwest Investment and Business Advisors, PLLC)	Pro Bono work is not as accountable as client facing paid work.
Shara		How would one verify the 500 hours of pro bono experience? Self-reporting?
E	A	Probono work SHOULD NEVER be used for any credit or it just becomes free work you do to get benefits.

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