

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:

If the recommendation to increase the required CE hours to 40 hours every two years is approved, allow up to 10 CE hours to be earned through pro bono service at a ratio of three hours of pro bono service per one hour of CE.

First name	Last name (c/o firm name, if applicable)	Response
Laura	Abbott DeCarolis	as I answered previously, pro bono work should not be viewed differently than work done getting paid
Brian	Acker	First, I don't want to go to 40 hours. If you do, please allow the Pro-Bono work to satisfy. I'm not sure how you verify we are providing Pro-Bono work.
Jessica	Adams	No issues.
Laurie	Adams	Pro bono work supports experience. It is not a proxy for education.
Lucas	Adams	Practice is its own form of CE. People need our services. Seems logical.
Patrick	Adams	This appears to be a way that the CFP Board can force 'recorded' Pro bono work and not really concerned about CE.
Charles	Adi	Pro bono service does not equate to continuing education.
Dennis	Adler	Support this, but how is it going to be monitored?
John	Aguilera	I don't see how pro-bono work helps educate anybody in our industry.
Aaron	Ahlstrom	Makes sense
Frank	Akridge	pro bono is awesome, but won't help my needed education
Nicholas	Alcorn	Again, I DO NOT WANT MORE CE ... but, if you must, this is a way to make it less painful? Although I'm not convinced it would be due to the 3:1 ratio (madness by the way). How is pro bono reporting audited? Does telling my nephew he should buy NVDA with his lunch money count??? I mean, seriously come on.
George	Allen	Why would professionals work 3 times as hard to do pro bono if they don't even match the CE standard? Wouldn't the goal of this be to make pro bono work more attractive?
Edi	Alvarez	It is either PRO BONO or NOT ... anytime you receive credit then it is NOT PRO BONO!! I don't understand why this concept is so hard to get ... IF YOU mean give free work to someone so I don't have take courses to get the training you claim is needed to support my profession then go ahead but otherwise there is NO LOGIC to this proposal. I don't get how we are to follow rules from a Board that seems to not understand that the CFP marks degraded by this type of action
Christopher	Amenita	No objection nor any adamant support, not familiar with this process.

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Ramzan	Amiri	I do not like the pro bono service because it is challenging to monitor. Therefore, it does not add value to the certification process.
Michael	Andrews	Trying to force probono work defeats the spirit of that work.
Srihari	Angara	This is adequate to meet standards
Anonymous	Anonymous	See previous answers.
Elliott	Appel	I did 40 hours of pro bono service last year. I support using those hours to fulfill CE requirements, but I am adamantly opposed to requiring 40 CE hours instead of 30. I do wonder if it's actual about learning with CE, why would you allow pro bono service to count? It's not learning.
Bill	Aquila	This gives away the fact that increasing the CEs is NOT actually about education. Tell the board to stop being dumb. If you want to make a pro bono requirement, put it to a membership vote. But trying to incentivize pro bono service by increasing the CE requirement and offering a way to meet that new requirement by offering this is an insult to our collective intelligence.
Jaycob	Arbogast	This one is tough for me. I very much want to promote pro-bono hours for CFPs. but If we say that pro-bono hours are the same as CE hours, then why aren't my for-profit clients counting towards CE? I'm already working 2,000 hours per year, so am I getting 2,000 hours of CE for that? That said, I highly applaud Rachel Roth and the Foundation for Financial Planning and their work. I've done pro-bono work through their service and posted opportunities with them as well.
Stephen	Archer	I would agree.
Brenda	Armstrong	This is a good way to encourage pro bono work.
Laura	Armstrong	Encourages professionals to help worthy causes and get credit.
Christopher	Arnold	I believe it is better to keep the two subjects - CE and pro bono service - separate as they are 2 different things.
Andrea	Ashbacher	Why not? But who is tracking???
John	Atwater	Looks like this could get complicated. Would Pro Bono service still be self reported?
William	Austin	I support all the proposed changes except for increasing the CE requirement to 40 hours from 30 hours. Most financial planner have CE requirements that don't qualify for CFP CE. For example, I have ethics CE for my insurance license and additionally firm element annual requirements. My CE requirement from all sources is approximately 60 hour every two years already.
Daniela	Aviles	But make it a 1:1 ratio
Alison	Bach	I don't understand why pro bono hours would be a substitute for CE from an educational perspective.
Drew	Backer	I'm all for pro bono work, but CE is meant to learn new product/industry changes or reinforce information on important topics. You don't get this with pro bono work.
Raymond	Backers	I do not agree that working for free increases one's knowledge.
Colleen	Baird	I feel if one has opportunity to provide service to people of lessor resources... AND the people COMMIT to changing that should be a bonus because the bulk of that

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		job is us educating and truly helping people learn to 'respect thier money' thru a disciplined approach in spending and saving.
Douglas	Bajor	Very practical.
Luisa	Baker	No more additional CE.
Nicholas	Bakker	This could easily be manipulated.
Michael	Baldwin	I still don't think forced CE is the best way to keep CFP® professionals up with their professional development. At the same time, allowing a non-CE based way to earn CE seems to further muddy already murky waters.
Darryl	Banks	This change does provide a good incentive for the CFP professional to engage in pro bono work and that is only good for the perception of the designation/brand.
Andrew	Barfoot	I like the creativity. A bit much to track and report, but the idea is good.
Christopher	Barker	Love this idea for the three comments I mentioned before. Pro-Bono service is important for the profession and its also rewarding. I dont like that the proposed change is going from 30 to 40 hours. And its not because im lazy, its just a bunch of hours clicking through some timed slideshows talking about irrelevant topics. Most of the time I dont realize its an irrelevant and stupid CE course until I am half way through. its not like im going to stop, pay more money to get another course and start over. So I, like many other CFPs just sit through some boring useless CE.
Alan	Barnes	If you approve the extra 10 hours, make it hour for hour for pro bono work.
Lloyd	Barnhardt	This makes sense and helps the broader community.
Meg	Bartelt	What's the point here? Is it to drive planners to provide more pro bono service? Or is it to improve our education as financial planners? Those are probably BOTH goals of the Board, but that doesn't mean it's helpful to mix 'em together. I'd like to see education and pro bono efforts kept separate. If you really really want CFPs to do pro bono/think they should as part of their professional status, make it a requirement.
Andrea	Bartlett	This further complicates the requirement. I think it's important for CFP professionals to stay current with rules and regulations. This proposed change is just a way to steer professionals into the referral system of the Foundation for Financial Planning.
Tejuana	Baskerville (National Association of Personal Financial Advisors)	As mentioned previously, NAPFA supports pro bono work and grants CEs for it, and having this work count for CFP® CEs would encourage more participation. A cap of 6 hours of pro bono CE seems more reasonable, allowing the addition of more hours to general education requirements. HT
Marc	Bastien	Too complicated. There is no educational value in pro-bono work. There is serious value, but the lessons learned are more sociological in nature and not necessarily applicable to the practice standards. I'd prefer to keep these domains separate.
Craig	Baum	CE should be course work and case work by CE vendors.
James	Bayliss	If we are doing the work give us the ce to show it. You are taking my time away from clients todo ce so I may as well get credit when actually doing my job as a CFP.

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Thomas	Baysinger	I strongly oppose the increase.
Chris	Beard	I do not agree with the move to 40 hours, so cannot agree with this.
Steve	Beard	Do this even if the 40 hour suggestion isn't passed
Chad	Bearden	Pro bono work isn't going to flex the mind or creativity worthy of CE because it will be with lower income families who do not have the resources that will make a CFP holder think.
Leslie	Beck	Why should pro bono count toward CE, when paid practice does not? Makes no sense. Do something else to encourage pro bono work!
Thomas	Begley	I have no opinion on this.
Phil	Behnen (Centennial Advisors LLC)	40 hours is ridiculous
Brettq	Beimers	Again, I LOVE adding Pro Bono!
Jason	Bely	In order for Pro-Bono service in lieu of CE to work, there needs to be more structure around the pro-bono planning process. Otherwise this approach seems to be a watered down way to achieve the CE requirement.
Chet	Bennetts	The proposed change to allow up to 10 CE hours to be earned through pro bono service, at a ratio of three hours of service per one hour of CE, aligns with the profession's broader commitment to social responsibility and community impact. This adjustment encourages CFP® professionals to engage in meaningful pro bono work, which can help expand access to financial planning services for underserved populations while fostering professional growth through practical experience. However, it will be critical to ensure that pro bono activities eligible for CE credit meet established standards for quality and relevance to financial planning. The 3:1 ratio may warrant further consideration to ensure it appropriately reflects the effort and value of pro bono work compared to traditional CE activities. Additionally, clear guidelines and oversight will be necessary to maintain the integrity of this pathway and ensure that the primary focus on professional competency is preserved.
David	Berkeihiser	There should be no increase in required hours from 30 to 40. See the following- I received my CFP Designation in 1999 and have been in the industry since then. The amount of CE I need to complete for all of my various professional designations, BD, RIA, States, Insurance, etc. is already way too much (out of hand). Adding more CE will not make practitioners more qualified and will only serve to incentivize CFPs to choose the easiest least effective CE alternatives possible as they are already inundated by a tsunami of CE. You will likely also see some practitioners drop their CFP Designation because it's just not worth the cost and effort. I strongly oppose increasing the CE Requirements at all. Thank you!
Robert	Beswick	Stop specific CE requirements the industry is not protected by CE it is ethics.
Kenneth	Bieri	Why is the Pro Bono credit not 1 for 1?
Joshua	Biggs	I strongly oppose the increase to 40 hours for CE over 2 years, therefore I have no opinion on this proposal.

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William	Bivin	Most practitioners spend significantly more effort on continuing education than just the CFP requirement, much of which does not cross over. 30 hours every two years is enough.
Kathryn	Blake	I agree; this will encourage pro bono work.
Steven	Blandino	Keep the 30 hour CE requirement as is. Allow CFP professionals to offer Pro bono at their discretion. I do it a lot over the year. I may not always report it to CFP, I just do it. I think that speaks on its own to those that receive the assistance. These people see the value of the CFP and the advice provided.
Brandi	Blaylock	Pro bono work again seems difficult to track and also, could cause issues with marketing yourself and other compliance restrictions with other certifications or licenses.
Peter	Bobolia	Why 3 for 1? Serving the public with pro bono hours is more difficult NOT less difficult than sitting on a webinar for one hour. That doesn't seem to make sense. A 10-hour limit is logical because CE experience and topics should be varied and diverse.
Keith	Bock	Way too much potential for abuse - can pro-bono service be individually verified?
Nick	Bodnar	I do not understand how providing pro bono work could be considered education.
Jose	Bohorquez	CE is fundamental to continue to help clients, plus I think CFPs should be on par to what other prestigious designations require in terms of CE.
Brian	Boisselle	pro bono should not count toward education.
James	Boles	This is helpful to show the goodwill of the CFP Board and the goodwill of the CFP professional.
Keith	Bonner	Drop the Pro Bono emphasis. You are defeating the purpose.
Jeremiah	Borage	Make the ratio 1:1, and I would be in favor of this requirement.
Becky	Boston	My firm doesn't quantify pro bono work. I know very little about how this pro-bono option would intersect with the policies of other brokerages. I don't feel it would be my place to comment any further on this subject.
Jordan	Bowersox	Donating your time is not equivalent to learning ways to better perform our duty to our clients. Ridiculous thought
Christopher	Bowman	I have no opposition to this proposal.
Scott	Bown	If I am following this, you would require an additional 10 hours of CE hours, provide an option to attend a course in order to qualify for using pro bono hours towards CE credits? And, 3 hours of pro-bono work for 1 hour of CE? So, I would need to provide 3 hours of pro-bono work for 1 hour of CE, when now, I can take 1 hour of a course for one hour of a CE. I am not seeing the value from a time standpoint.
John	Boyle	Experience should not count towards education. Education advances technical knowledge. Pro bono work would very likely be performed down market and would result in very little learning if any.
Phillip	Bracey	a benefit to the community and advisor
Charles	Bradshaw	Pro bono work does not equal CE. If this is adopted, you should allow certificates to be credits that would be donated to the foundation.

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Cindy	Bragdon	While I am a strong advocate of Pro Bono work, the type of work and organizations through which it is earned should be vetted and specific.
Nathan	Bragg	Again, using pro bono service and experience to bank hours is a good thing.
Jason	Branch	I do not believe that pro Bono work should count towards CE credit.
Tina	Brannan	Great idea.
Charles	Bremer	See previous answers. More CE's does not necessarily translate to a better CFP.
Sarah	Brice	I feel that it would be impossible to require all CFP professionals to do pro-bono work, but it would be crucial to allow the use of Pro Bono work towards CE to encourage and support professionals to serve others. The need for financial literacy and planning is far more broad than just high net worth or high earners I, and should be encouraged.
Sterling	Brightman	Po Bono work is expected of us. There is no CE involved. This should not pass.
Emily	Brown	Allows CFP Professionals to meet requirements in whichever way works best for their schedule and life style.
Gail	Brown	Showing higher competency by increasing CE's to 40 hours is appropriate. If you allow individuals to use Pro Bono hours, there is a high chance of abuse. What is the point of increasing the CE hours if one can use pro bono hours in place of increasing knowledge.
James	Brown	I am not interested in the pro-bono component of this.
Kyle	Brown	Pro bono work is incredibly important and valuable for society. However, pro bono work is NOT the same thing as CE. CE is a (sometimes virtual) classroom based learning with a very high density of information from an instructor who is already an expert. Although advisors can undoubtedly learn from doing pro bono work, the lessons learned are likely to be at a tiny fraction of the frequency that items would be learned in a classroom setting. It is misleading to the public to state that those with the CFP(R) marks receive 40 hours of CE every 2 years if in fact they only receive 30 hours and perform 30 hours of pro bono work.
Mark	Brown	Pro Bono work should be voluntary. i also feel that 30 hours of continuing ed is too much. so 40 is much worse.
Al	Bruchnak	I would strongly suggest leaving the current CE requirement at 30 hours.
Kasey	Buckner	Just let the hours be hours of study, whether 30 or 40. (30 is better.) Pro bono work doesn't often delve into advanced topics, which most CFP Pros want to learn about so they can grow their knowledge AND clientele demographics.
Dallin	Bunnell	Too complicated.
Robert	Burns	Again, I don't support requiring Pro Bono work or increasing CE to 40 hours. If I choose to volunteer, that is my choice. With regard to CE, I feel I spend too much time doing that already.
Emily	Bushong	Pro bono work should be voluntary or else the results will likely be sub-optimal for the recipient of the free advice!!!
John	Butcher	The language in this 'The Commission suggests CFP® professionals attend a pro bono education course specific to the activity in which they wish to engage. This program would be implemented on a trial basis through the Foundation for

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		Financial Planning, leveraging their pro-bono education and referral system. Additionally, completion of the coursework would count toward CE credit as it is today.' is not really clear. Particularly the part about 'pro bono education course'. Is it coursework or is it service? Or both?
Cassidy	Butler	Encouraging pro bono work is good for the industry
Alan	Caldwell	YES, we need to support and encourage Pro Bono work. This is important, people need help!
Christopher	Cameron	In favor of increasing probono work offering services to those who may not have the means to hire a planner/advisor
Chad	Campbell	Seems like a reasonable trade off.
Daniel	Cape	probono work is NOT CE. If you want us to be continually educated, then have us be educated.
Sabrina	Carlson	Hmmm. Not sure. I need to better understand how completing pro bono work leads to deeper understanding of planning topics, I'm all for encouraging pro bono work but how does this increase our competency?
Donnie	Carpenter	It's admirable to put a carrot out their for pro-bono work, but I feel like the reporting would allow advisors to simply take advantage and falsely report pro-bono work.
Gordon	Carpenter	probono is not content learning. Makes no sense if content is what the CE program is intended to be.
Michael	Carpenter	A Certificant having to pay to provide pro-bono education is contradictory.
Charlie	Carroll	Service to others within the communities we support is a natural part of my practice
Anthony	Carter	I support this proposal
Brian	Cartier	If the purpose of CE is truly education, why would how much is charged for financial planning services dictate whether a CFP professional learned something? CE needs to be real education. This seems like a way to force CFPs to provide pro bono hours. (a lot of CFPs do pro bono and do not report it).
Shane	Cason	Do not want 40 hours of CE requirement, no matter how it is earned.
Steven	Cass	I feel recognizing Pro Bono work is admirable and displays commitment to the profession.
Jonathan	Castle	Pro bono work is, for the most part, not particularly challenging. It generally involves helping someone reduce debts, create a budget, and learn more basic financial planning skills. I doubt that many CFP professionals will learn that much from this activity - and while it is honorable, I don't see it increasing the collective skills of the organization as a whole.
Ruth Auer	Chady	Also include teaching, mentoring & service based. 3hr equal 1 ce.
Teresa	Chapin	What is needed to verify pro bono service for this purpose?
Melody	Chartier	This recommendation should not be contingent on the 40 hour change. This should be allowed for 30 hours.
Shaun	Chelf	This makes no rational sense. Is the point of CE receiving education you would not otherwise be exposed to? If so, how does Pro bono work make a suitable

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		substitute for that? If it is, then paid work will give you just as much experience and you are as likely to learn something. Thus, it becomes apparent that experience/learning isn't the true issue. This proposal makes CE look more like haze and if you are willing to do something charitable for someone, you'll let us out of the haze.
Jeffrey	Chesner	As I mentioned earlier, the CFP Board is promoting doing pro-bono work, so I understand the reason for this change.
Susan	Chesney	I think this is a better way to encourage pro bono services in the profession.
Christopher	Chestnut	no way to see if they CFP holder is actually learning anything....they may just get to use hours their broker dealer generates...easily manipulated
Scott	Christian	I am in favor of pro bono work but not increasing the hours requirement to 40 hours.
Kevin	Churchill	We don't need more CE, especially when we have NASAA adding a bunch of unnecessary CE that is not always compatible with the CFP and others. More CE is not going to make better CFPs. And making it 30 hours to get 10 hours of CE likely discourages the behavior you are seeking to encourage.
Kari	Cierley	There is no way to confirm these hours took place. Some firms like mine will not allow CFPs to perform pro-bono financial planning.
Anthony	Cisek	You should do that now. Why not allow 1pm hours to be pro bono work without adding additional hours?
Sean	Clancy	I appreciate the effort to get more pro bono work, but don't think it goes to the heart of what CE's are used for
Jamie	Clark	The more complicated you make the CE requirements with these formulas, the more mental energy it takes on our part away from serving clients.
Michele	Clark	This might encourage people to do more Pro Bono work and to track and report it. I don't track currently so I don't report or underreport.
Scott	Clark	I'm opposed to increasing CE to 40 hours every two years.
Steven	Clark	I think this makes a lot of sense however, I think the ratio should be one hour of pro bono service per one hour of CE.
John	Classe	Let continuing education serve its intended purpose of a CFP professional remaining proficient in current law. Pro bono service is not the same. It provides experience but may or may not provide needed education.
Gary	Clement	This is a good way to support Pro-Bono efforts.
Rebecca	Clements	It sounds like you're wanting to increase the CE requirement so that people will be more willing to do pro bono work.
Chuck	Clifton	The purpose of CE is to keep one's skills sharp. The purpose of pro bono is to extend services to clients who might not be able to access the firm's fee structure. These are unrelated, so this proposal seems to be a contrived structure where CE was increased and then a pass was given if you did extra pro bono. If you want firms to create more accessible services, then create that as a separate requirement, but don't coningle it with CE which is about technical competence, not affordability.

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Daniel	Clothier	I can see both sides of this and am fairly indifferent.
Heidi	Clute	1 hr = 1hr of CE.
Monique Rene	Coates	I support this initiative. Using Pro Bono / Volunteer work or Pro Bono / Volunteer CE courses that would be counted toward general CE - Continuing Ed is good  ! However please reconsider having it take 30 Hours Pro Bono Work = Only 1 Hour CE  . Thank you.
Lisa	Cochran	I would support this if the pro bono hours directly correspond to CE credit hours and only if the pro bono hours are spent serving the public such as providing planning to low income communities or VITA tax services. I feel like this could get abused if there is a broad definition of pro bono and who it helps.
Laurie	Coe (A.D. Banker & Company)	We fully support the proposal to allow up to 10 hours of excess Continuing Education (CE) hours to carry over to the next two-year certification period. This flexibility encourages professionals to exceed their CE requirements without the fear of losing their extra efforts. By permitting the carryover of excess hours, we can promote continuous learning and ensure that professionals remain up-to-date with the latest knowledge and skills. This proposal is a practical and beneficial approach that acknowledges the dedication of professionals to their ongoing education and development.
Eric	Coffman	I believe in donating time, energy and money to the community (which I do) which includes pro bono service to those who may not be able to afford traditional planning services. However, there is no way to prove the pro bono service actually occurred. I also understand the board's desire to enhance our image, but this feels too paternalistic. We can encourage others on to moral, noble, and charitable behavior but tangibly putting the carrot out there as a part of our ongoing status is something we should avoid.
Steven	Coker	Pro Bono hours may reinforce existing knowledge, but do not keep a CFP professional abreast of new laws/taxes, etc. They are separate in terms of goals and what they accomplish.
Erna	Colborn	Not sure - but providing pro-bono services is not continuing education in my personal definition. Some firms may not allow pro-bono work creating a differentiated standard for those with a CFP designation.
Akil	Cole	I don't want it to be increased but if it is, the pro-bono substitution would be helpful.
Audra	Collett	Don't have an issue with taking the pro bono course counting for CE. However, pro bono work is not equivalent to CE. CE is to educate you on current changes to our profession or gaining more knowledge in a specific area. Pro bono work doesn't accomplish this.
Christopher	Collier	I don't have the time or stress capacity to do Pro Bono.
Daniel	Conroy	I like the spirit of this proposal, but ultimately I believe CE should be about education.
Alyson	Coran	I oppose 40 hours

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Andrew	Cove	Again, anytime we can help serve those, or encourage people to serve those who are less financially fluent, i think is a good thing.
Stephen	Craft	This is a positive change.
Brian	Creencia	How would this be determined? It's an interesting idea but I think it is vague.
Jose	Cuevas	Pro bone work is not continuing education, it's charity.
Rachel	Currington	In support only with strong controls/limitations about what work is allowable (e.g. offering financial literacy classes in schools is ok but helping your friend for free is not)
Eric	Curry	Pro bono service is valuable. Providing this service should be allowed and may increase awareness and improve the image of our certification.
Michael	Curry	I don't believe pro bono hours should count towards CE requirements at all. The purpose of CE is to continue our education and remain current (in my mind).
Michael	Daley	This would be fine, but I would prefer to see it applied to the existing 30 hour requirement in a similar formula while reducing the overall requirement for continuing education hours each period. For example, 20 hours via traditional CE with access to 10 hours via pro bono service AND the ability to carry over 10 hours period.
David	Danvers	Perhaps a 2:1 ratio. 3:1 means 30 hours for every 10, almost a week's work vs. two days work.
Galan	Daukas	Good idea
Dennis	Davis	pro bono work does not provide education on new rules, procedures, techniques, strategies nor new tools.
Patricia	Davis	I do not support the CE increase to 40 hours. In addition, allowing pro bono service to count as CE is like adding hours for serving clients not pro bono. We learn every day through interactions with our clients - whether paid or pro bono. This should not be treated as continuing education.
Susan	Davis	But please do not increase to 40 hours.
Matthias	Day	I think this would be great. Our profession is sadly not the most oriented toward lower-income families and I think it would do a lot of good for our profession CFPs were incentivized to give back. Also, the financial services industry unfortunately has history of taking advantage of the vulnerable (wolf of wall street, deceptive insurance sales, etc.) and I think a stronger emphasis on pro bono work would better position CFPs as 'the good guys.' And we ARE the good guys.
Alan	De Michele	I am not sure that providing Pro Bono services does anything to provide additional education/skills/knowledge to a CFP. Ideally the Pro Bono services being provided by the CFP are in an area of expertise already!
Massimiliano	De Santis	The purpose of CE is different from the purpose of pro-bono work. Assuming there is agreement that 40 CE hours are better than 30, it seems a contradiction to then say that 10 can be pro-bono work. Does the profession need 30 or 40 hours of CE? Also the 1:3 conversion is arbitrary. Pro-bono work is different work than CE. And how will you monitor that? will it be self reported?
Garrett	Dearden	Against 40 hour increase but for more pro bono work/integration to the marks.

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Anthony	DeBellis	Pro Bono is not learning. If you are requiring us to spend more time getting CE, it should apply to learning.
Michael	Dechiario	Sounds like a good way to encourage pro bono help. Should not be mandated but left to the planners' choice.
Leonard	Del Gallo (DFS, LLC)	No reason to increase it to 40. It will just cost CFP Professional more money with little value to clients or the CFP Professional. The CE sponsors make more money and that is it.....
Miguel	Delgado	This sounds a bit ridiculous.
Morgan	Denham	The increase in CE hours is to uphold and ensure CFP® professionals are knowledgeable and are providing advice and benefit to clients at a higher standard. Letting pro bono hours count for CE defeats the purpose of increasing CE requirement.
Kathleen	Dennis	Do not increase the required CE hours to 40. If you want to allow pro bono service to be counted as CE credit then each hour should be counted toward CE. Spending 3 hours conducting CFP work should not be counted as only 1 hour of CE.
Bob	DePasquale	I'm not sure if 3-1 is the right formula but the concept is terrific. 2-1 might give more incentive to a good cause.
Ashish	Dhamal	Additional education is always good. I like the idea of no carryover.
Patrick	Diamond	If this is saying that 3 hours of pro bono service equals 1 CE hour then I strongly oppose.
Michael	DiGrazia	I do not believe pro bono work should be used for this reason. I believe the work is different in most cases and this will likely have professionals doing pro bono work for the wrong reasons (which may result negatively in public perception).
Ryan	Dillon	Proposal seems acceptable.
Brian	Dixon	Free planning services are not CE.
Mitch	Doman	I think Pro Bono work is great, but it doesn't accomplish the purpose of CE. If we are going to require CE hours, lets do it to become better practitioners to better serve our clients.
Daniel	Dorval	I oppose only allowing pro bono work to count when non-pro bono work does not count. Why would pro bono work be more valuable from a CE perspective than other financial planning work? I do think it makes sense to offset ANY CE requirements with ANY legitimate planning and advice work. If three hours of planning service equals one hour of CE, I already have many hundreds of hours in valid CE. Why do I need to pay for more CE or have to perform pro bono service?
Dominic	Dougherty	This sounds fine but I hope it's not used as a justification for increasing the number of required CE hours
Neil	Downing	Keep the CE requirement to 30 credits every two years - and allow up to 10 CE hours to be earned through pro bono service. And make sure that the CFP Board does not charge the certificant extra for reporting and processing pro bono service hours.

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First name	Last name (c/o firm name, if applicable)	Response
John	Duda	I believe if you perform charity, no one should know except you and the people the charity was performed for.
Josh	Duncan	I don't understand the push for all the Pro Bono work. If CFP Professionals want to provide Pro Bono services then they should do so. Plus, I do not support the increased CE hours to 40 every two years.
Spencer	Dung	While I appreciate the thought of promoting more pro bono service; that service is not a sufficient substitute to ongoing and continuing education. The purpose of requiring Continuing Education should be to ensure professionals are staying up on new and/or changing rules, regulations, standards, etc. Simply completing pro bono service does not ensure that is happening.
Michael	Dunlop	I do not support this proposed change. While encouraging pro bono service is a commendable goal, tying it to continuing education requirements seems misaligned with the purpose of CE, which is to ensure ongoing competency in financial planning. Pro bono work, while valuable, doesn't necessarily provide the same level of professional development as targeted education on evolving planning strategies, regulations, and best practices. If the aim is to increase pro bono participation, it would be more effective to promote it through separate initiatives rather than integrating it into the CE structure. Maintaining the focus of CE on skill-building and knowledge advancement better serves both professionals and the clients they support.
Blaine	Dunn	If the purpose of the new regulation is to become aware of new laws and regulations, then how does pro bono work help to meet that goal? Pro bono work does not increase the knowledge of new laws and regulations.
Dylan	Dwyer	I would prefer the ratio to be reduced to 1:1 or 2:1. The CFP board seems to be making a push for pro bono hours, which I support, and this would be a good way to support that.
Jacob	Echols	I don't agree with the idea of using pro Bono time this way
Peyton	Eckert	I do not agree with the increase in total CE hours but have always thought pro bono planning should alleviate CE hours or admin fees for CFPs, as they are such a beneficial practice for the CFP community. So long as that and the 10-hour carry forward rule are implemented, I can support the increase in total CE hours.
Richard	Eddy	No, CE should be CE. Experience should be experience. Further, I don't particularly like what the CFP board is attempting to do here with this proposal.
Ryan	Edmonds	If field work counts as CE let the ratio be 1 to 1. Experience breeds competency much faster than theoretical learning.
Dana	Edwards	I do not feel that pro bono work should count towards continuing education.
Larry	Elkin	Elsewhere in these comments I avoided adjectives to describe the proposals relevant to CE. In this section, however, I believe the word 'grotesque' is applicable. It changes the nature and purpose of CE requirements from the protection of the public's welfare (be ensuring competence) to a tool of control by the CFP Board over the professional activities of its licensees.
Kevin	Ellis	When are we supposed to find the time for pro bono work if you're shoving more CE requirements down our throats?

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Ivy	Emerick	This may motivate more professionals to do Pro Bono work.
Matthew	Emmer	I don't think the pro bono service applies to every CFP area and I am strongly against increasing CE by an additional 10hrs.
Angela	Epley	Why blur the lines between education and experience? If you want to recognize and encourage more Pro Bono engagement, you should instead require 10 hours of Pro Bono service work every two years according to the ratio you've outlined above.
marcus	Esposito	It would be helpful but I do not understand how this is considered CE
Amanda	Farr	If we go to a 40 hour CE requirement, then I agree that we should be able to do pro bono work for ten of those hours.
Jeff	Farrar	I'm 100% for the 40 hour increase but not this. This feels too heavy handed to me. Clearly the CFP Board wants to increase its relevance with the public by 'nudging' the 100,000 CFPs into doing Pro bono work. If they want to do it let them but this is too big brother for me. And doing three hours of pro-bono work is functionally no different than someone doing three hours of financial planning in their practice. they are using the same tools and muscles- so if you get credit for pro bono why not the actual day to day work? See what I mean?. CE is to make sure you learn new stuff not to fulfill the CFP Board's political desire for more scope, power, and influence. I say this as a former CFP Board Director. I understand the intent- but too much. back it off.
David	Fedorka	I oppose the jump to 40 hours but would welcome 10 credits to help satisfy the current 30 CE credits
Tyler	Fedrick	Keep CE as it is. This does not help in any way.
George	Fernandez	I believe this balanced approach for encouraging Pro Bono efforts is great! If the CE requirement increases, I'd like to see the Pro Bono component be included. If it isn't, and Practice Management isn't, then keep it at 30 hours every two years.
David	Fernelius	I've got a better idea.....allow more webinars / podcasts / education formats to go toward continuing education. Many of the webinars I attend apparently don't bother to get CFP approval....not sure why other than it is not a convenient process. Seems this is an excuse / justification for raising the hours to 40.
Ray	Ferrara	This is a tough one for me. Pro bono would seem to indicate that you don't get rewarded for doing the work. Also, how do you monitor this? If implemented, there needs to be strong oversight.
Christina	Ferrer	I don't support bribing for CE work. I want professionals to do pro bono because they feel it is the right thing, and they will take it seriously and do a good job.
Emerson	Fersch	This also makes sense – pro bono should be optional and the choice of the individual not a mandated requirement.
Brian	Fields	See previous comments. Plus hard to properly document and ensure Pro Bono hours are being actually completed.
Russell	Fields	No. Pro bono work is not the same as CE.
Alice	Finn	See end

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Kathryn	Fisher	This is getting to be like the 'simplified' form 1040. How on earth are you going to track all of that? There are better, more straightforward ways to encourage pro bono service.
James	Flanagan	It is unclear to me how pro bono service has much to do with CE. In fact, I view it as a conflict of interest to 'pay' someone with CE hours for the pro bono or volunteer service provided. It sends the wrong message and doesn't look good from an ethics standpoint. In fact, It's not pro bono if you are paid with CE hours. I would expect 'volunteering' to be done to give back to the community, an individual, an organization etc. because the individual volunteering cares about that action or is passionate about that cause. I have seen and worked for corporations that incentivize their employees to volunteer by paying them their normal pay. I have no problem with that. However, I don't think this has any place with the CFP Board. If you feel we are not volunteering enough and reporting it to the Board, please find a different way to incentivize. We don't need 30 hours of CE plus 10 more from volunteering 30 hours to stay educated and up to date on Financial Planning. We either need 40 hours of CE or we don't. Please don't confuse these two issues- Volunteering and Education. That said, I would be in favor of any classes required to provide pro bono be included as CE, as you are actually educating yourself. Thank you
Tim	Fliam	Seems like an appropriate offset and can help people on the process. This is a great idea. I would also be in support of 2:1 ratio for time.
Michael	Fogarty	This does not require a pro-bono provider to stay current.
John	Foote	Unnecessary standard and trying to discourage probono work
Arlene	Foreman	I oppose this unless other forms for pro bono work are also recognized for this purpose - an unlikely scenario because it would be too difficult for the Board to document all of the possible variations.
Adam	Fowler	I've never used this although I've done some. Things that are free are rarely held at high value. Continuing to encourage pro bono planning is a nice public stunt, but might be devaluing the public opinion of the planning community.
Hank	Fox	This proposal, if adopted, would allow 25% of the required CE to be earned through pro bono service. Even at a 3-to-1 ratio, this proposal proves a disproportionate amount of CE to pro bono work without any guideline on what would be considered appropriate to satisfy the CE requirements. Accordingly, the pro bono credit hours should be reduced or the proposal eliminated.
Mike	Fox	Enough with the additional CPE! It should not be passed.
Kerry	Franklin	I think pro bono services would be hard to verify.
Edwin	Free	How would pro bono service be any different than service provided to non-pro bono clients, such that it merits credit toward CE hours. How is it monitored. This seems like a back handed way of pushing people to do pro bono service. Although pro bono service is admirable, it should be a personal decision one does out of the goodness of their heart. Not because they may get credit towards CE. Besides it does not enhance a practitioner's competency just because the hours spent engaging with individuals in planning are pro bono. Those hours are no different

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		than providing time working with non-pro bono clients. Basically, it is like saying just doing your job is improving your competency. If that is the case, there should be no difference between pro-bono work and non-pro bono work.
Charles	Freund	Making things way to difficult.
James	Friddell	My only thought is that this brings a lot of good to the world, not necessarily the benefit of increased education and knowledge retention for our industry mentioned earlier in the increase CE to 40 hours.
Jakob	Fries	Pro bono work does nothing to ensure the competency of members. Maybe instead of dropping CE requirements as a way to encourage pro bono work, reduce the cost to renew instead.
Janelle	Fuhrmann	No more educational requirements
Guy	Fulcher	This one is too stupid
John	Galbraith	Pro bono work should be encouraged and this will serve that purpose
Guillermo	Gallegos Binder	Terrible incentive to push more Financial Professionals to engage in more pro-bono work.
Jim	Galpin	Providing advice on a pro-bono arrangement does not mean that the advice is up to date. If you want educated, competent people then go for education and competence, not some side hustle to avoid demonstrated or increased competence.
Rachel	Garner	This would help with any additional pressure felt by some in completing the higher number of CE hours proposed.
Cody	Garrett	I strongly support accepting CE hours by attending a pro bono education course but not solely through the Foundation for Financial Planning. Other non-profit pro bono organizations should be able to submit their educational programs as CE sponsors.
Kenneth	Garwood	No opinion
Anne	Gatti	Providing pro bono service does not have any relationship to learning. I suggest that up to 10 hours of annual CE may be earned by TEACHING CFP continuing education courses. Example: if the CE class taught would earn a participant in the class 1 hour of CE, then the instructor should earn at least 1 hour of CE for teaching the class. Additionally, may consider the instructor to earn 2 hours of CE for every 1 hour of CE taught. Instructor would not be allowed to earn CE credit for the same class more than once.
Christopher	Geddie	This goes hand in hand with my strong opposition to the 40 hour requirement. It is clear the Board wants to further promote Pro Bono work, but this is not the way. Requiring more overall CE hours and then trying to create a path of pro bono service as CE? First of all, is it REALLY CE? There are other ways...this is not it.
Tom	Geist	While I don't support the increase to 40 hours, this seems like a reasonable option even at 30 hours.
Matthew	Gelfand	Pro bono hours are experience based on prior knowledge and not a form of continuing education about new topics or skills. Making this change would dilute the purpose of continuing education.

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Marc	Genereux	The total of 40 hours isn't a major problem. As long as there are more options to take CE courses from other sources. Credit that can be applied to more than one certification and or license is critical. Otherwise, there would be a need to cut back on something or drop some licenses.
Kevin	George	Against pro bono and increasing the CE hour requirement for reasons outlined previously.
Theodore	George	Doing pro bono work is not necessarily educational. Teaching a class is. Giving advice is not.
Victor	Gersten	Strongly support
Amy	Gierak	IF 40 CE hours per period is required: allow the credit to be the number of Pro Bono clients or 3 hours/CE credit, whichever is higher up to 10 hours.
Jonathan	Gilliam	This seems equitable/fair. I enjoy that the CFP board is considering promoting pro-bono work with this proposal.
Kathryn	Gillette	I generally support this change but would request a 1:1 ratio of pro bono hours to CE.
Sean	Gilsenan	I am opposed to the 40 hour requirement, but if it passes, allowing up to 10 hours to be earned through pro bono service seems reasonable.
Joseph	Gitto	Can't deny pro bono work
Emiramis	Gjini	Personally, I am strong advocate of pro bono service. It was pro bono work that affirmed my decision to make a career change and become a CFP®.
Bruce	Glor	Pro bono work builds real world experience
Peyton	Glover	Again, leave it the way it is
John	Godfrey	This is not in the Theme of CE
James	Golden	Needles complexity
Tim	Goodwin	In my experience, pro bono hours are nowhere near an equivalent to a quality CE experience.
Daniel	Granucci	I oppose the increase in CE in all forms. I would be fine with this rule change with the current CE requirement.
Roy	Gray	While I agree that we need to give back to the community, this does not support the need to update our knowledge and keep current. I would be in agreement, if the certificate was required to have a certification in their area of pro bono service. (i.e. CDFA for pro bono work with divorces, Certified Special Needs Advisor for pro bono work with this group, CPA or tax designation for pro bono tax work, etc...)
Michael	Greco	Despite the Board's desire to put significant support behind Pro Bono work, allowing Pro Bono work to count as CE is like counting eating low fructose sugar as sticking to your diet. It's not related. Just because someone did pro bono work has done ABSOLUTELY NOTHING to further their education in the field or stay on top of changes in the industries in which we work. Would you tell a mechanic that because he did two free oil changes that he doesn't need to learn about the new brake systems on modern cars? This is entire notion is fundamentally flawed and inconsistent with the entire purpose of EDUCATION.

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Therese	Green	This is inconsistent with the supposed purpose of continuing education - to improve one's capability. If pro bono work is acceptable towards this goal, then so should paid service. The work is comparable - customized financial planning - and paid service is potentially even more complex for those clients with actual financial resources and estate needs. If pro bono hours are recognized, then all financial planning services should be likewise recognized. (Pro bono credit seems more appropriately applied towards service requirements.)
Andrew	Griffith	This proposal is not something that can easily be managed by the CFP Board.
Bridget	Grimes	I do not have time for probono work as someone who runs a small ensemble RIA. While I would love to, there is no way there is time in my schedule. I would support a proposal to allow for CE hours for the writing and speaking on financial planning that we do in the course of business.
David	Groe	Why no carry over? Why the push for pro bono service? CFPs that want to do service will do service. Quit trying to micro manage it.
Brandon	Gromadzki	loophole to avoid learning more. charitable yes, but its a quid pro quo that defeats the purpose of CE
Kathryn	Grover	I strongly support pro bono service among financial planning professionals.
Joshua	Guadarrama	Love it.
Phil	Guerrero	I am against the 40 hour requirement as stated previously since don't think it really means much. With that being said, if it is approved the Pro-Bono offset would be helpful so I guess I'd have to support that part. Still don't like the 40 hour idea.
Levi	Gunn	Stop making loopholes to avoid the real objective.
Scott	Gutman	This mixes goals and confuses the purpose of CE requirements. If the goal is to do pro bono work, then make that a separate requirement. If the goal is to do learning, then including pro bono work makes no sense at all.
David	Haas	Getting more CFPs to do probono is encouraged. I am all for it.
Patrick	Hagan	This would not improve service to our clients. We already have 30 hours of CFP requirements, 30 or more hours of State and additional multiple state CE requirements, we attend seminars without credits, Watch multiple Webinars without credit--- with timely information and education. We work with legal and tax professionals and share knowledge each year. Have to review tax changes and state regulations ongoing. We have vendors who also share some industry knowledge and best practices. Complete compliance reviews/training as required each year. Conservative Estimated -we are taking at least 2 days per month for some level of education that we only receive a small portion of official CFP or other designation credits.
Lucas	Hail	I don't think pro bono advice adds value to the CE requirement.
Ted	Haley	While this competes against the goal of strengthening the CE requirement, it also promotes pro bono work, and on balance it seems like an appropriate experiment to see if it prompts more pro bono work.
Andrew	Hall	I applaud this effort. I would be hesitant to support compulsory pro bono

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Gina	Hall	I feel that 30 CE hours is plenty and if 10 of those hours are from pro-bono education, so be it... why is the Board wanting to direct CE hours? It seems that they are propping up another entity to earn money here - Foundation for Financial Planning, is there crossover on boards/ownership?
Larry	Hall	Don't approve to 40 hours
Thomas	Halonen	I do not support increasing the hours required as that would water down the training. Busy professionals do not have time to EFFECTIVELY add more training hours. We would be looking for the fastest way to get through the training.
Trent	Hamilton	30 hours of pro bono for 10 hours of CE credit? Hello Mr. CFP, you can either sit and watch 10 hours of video and do nothing or you can work hard and help people for 30 hours and your reward will be the same, which will he choose? The incentive is clearly to go to a BS CE class and not do any pro bono work. Its clearly in the interest of the board to show that CFPs are charitable and happy to help, as shown by the question, so then why would you count charitable hours as a third of the value as CE? Charitable endeavors would be more challenging, engaging and societally, politically, financially and socially beneficial than any CE course would be for the CFP designation as a whole. CE should at least count 1 for 1 with Pro bono work, I would argue that three hours of CE classes equal one hour of pro bono work. Charitable giving should be a distinguishing feature of a CFP, the reputation can only improve with helping underprivileged individuals.
Mark	Hammaren	Totally against the 40 hours of CE
Kade	Hammes	I love pro bono service and the idea of rewarding that. However, pro bono work isn't education; it's experience. Let's not water down the education component.
Noah	Hankin	Pro bono work is not a substitute for continuing education. If the goal is to increase access to financial planning resources, a more effective approach might be to establish a nonprofit organization to compensate professionals for their time or to incentivize advisors to engage in pro bono work by offering reductions in license renewal fees or similar benefits.
Michael	Hanrahan	Now your talking about awarding CPE credit for uncompensated direct experience? How about you keep it simple and not mix the two? If pro bono is so important to you, offer a dues reduction for a certain number of documented pro bono hours
Renee	Hanson	Either you need 40 or you don't. Why would you send a message of education then give a caveat?
Parker	Hanson-Harden	Incentivizing can lead to more adoption.
Mingming	Hao	Makes sense
Charles	Happel	See previous comments
William	Harder	So if you do pro bono work, you can waive/exempt from some hours of CE..? Maybe 5 hours as an incentive but the purpose of CE is to continue one's education.
Darin	Hargreaves	Although I support pro bono service, it is very different than CE and should not be combined.

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Dean	Harris	Pro bono work helps public image of CFPs and helps local communities.
Josh	Harris	Strongly support
Adele	Harrison	My understanding of CE credit is to learn new practices, strategies, laws and regulations. When conducting pro bono work, it seems the professional is working from prior knowledge and not new knowledge.
Gerri	Harrison	If you force a pro bono education course, I think individuals would turn away. Each organization often has its own training process and to add another requirement would be difficult.
Ryan	Harvey	While I fully support pro bono work, performing pro-bono financial planning does not provide education.
Andrew	Haskell	I don't support increasing the CE requirement to 40 hours so weighing in on this might wrongly imply that I support the increased CE requirement.
Michael	Hathaway	Sounds complicated; not sure how 'pro bono' is necessarily 'educational' or related to 'competency'.
Lauren	Haynes	Though worthy and valuable in its own right, pro-bono service generally does not provide the increase in knowledge that traditional continuing education promotes. If the Commission believes the required CE should be 40 hours not 30 hours, and that the Board should have the right to dictate specific coursework based on current events, then presumably the Commission believes CFP® practitioners need additional time learning to stay abreast of changes in our space and pro-bono service would not be an appropriate substitute.
Lindsey	Heglar	The term pro-bono will need to be explained in more detail, if that is the case.
Daniel	Heidel	Pro Bono experience is a great way to accumulate CE and experience hours, so I am in full support of this rule change.
Alana	Heim	I strongly oppose 40 hours. I strongly oppose how this is written and calculated. Allowing pro bono hours is a good thing, but to give 30 pro bono hours to qualify for only 10 CE hours is excessive.
Anthony	Hellenbrand	You learn 10x more in practice than you do in a class.
Brenton	Helms	Do not see any problem with this.
Joel	Helzer	Pro bono is great!
Eric	Hencley	I don't believe the requirement should be 40 hours.
Jay	Henry	Should not be considered Pro Bono if has incentive to offset CE Requirement.
Terrence	Herr	We don't need additional continuing education requirements. Allowing pro bono services to meet CE requirements invites a process by which the information cannot be otherwise confirmed. CFPs should not be forced into providing pro-bono services unless they choose to. I perform pro-bono services and I do not report them to the CFP Board because I do not think it is your place to know anything about it.
Andrew	Herzog	Once again, charitable work should be done for its own sake. Continuing ed should be focused on learning something new, brushing up on something, and forcing the CFP to take the job and designation seriously. Don't overcomplicate things with phaseouts and ratios and conditions.

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Joshua	Hester	I support Pro Bono work to help provide education and resources to families and groups who do not have assets to access CFP Professionals. This seems ideal to make that mutually beneficial.
Sam	Heveroh	I again do not support that nor do I think that 3 hours of pro bono work somehow equates to 1 hour of continuing education. I can't strongly disagree enough with this
Jeff	Hinish	What does pro bono services have to do with CE? These are not the same thing! If you want to encourage pro bono (which it really seems you do) that's fine. Incentivizing Pro Bono by tying it to some other requirement is not a good idea. People are just going to say they did 30 hours of pro bono (whether they did or not). This is an ethical issue! Feel free to come up with a pro bono tag you can add to your CFP. Make a new category of CFP that is pro bono certified or something. But the last 2 renewals I think CFP has asked for pro bono hours to be reported. Why do we have so much of a push for this? Are consumers asking for CFPs that do a lot of pro bono work? If so, add a new designation. Charge some extra money to be a CFP - volunteer certified - or something. If there is more demand for that then people will pay more to become that. Although I do pro bono work each year, it is not a CFP requirement nor would I expect it to be. Just like I don't expect my CFP to be required to do pro bono work (and I would not seek out one that does so). I wouldn't seek that out in a life insurance rep, financial analyst, etc. Maybe I am in the minority. It's nice if someone does pro bono work (and I do) but why tie this to CE????
Deb	Hinton-Brown	No as I don't support the 40 hours require. Some may not have the bandwidth to accrue pro bono service due to other obligations.
Mark	Hoemann	too complicated
Patrick	Hoffman	I don't want to see increase I CE requirement unless there are increases in fraud or cases of CFPs losing designation. CE is just that, education, not pro bono.
Cheryl	Holland	Pro bono is not CE
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	In my opinion it is an inefficient use of time. Pro bono is good. If you are going to use this, make it 1-1.
Scott	Holman	I hope 40 is not approved!
David	Holtzman	As noted previously, I oppose the increase in required CE hours.
James	Honaker	Not really sure I follow this.
Aaron	Horne	I don't understand how pro bono work would be considered CE for a currently practicing financial planner. It seems like an 'extra credit' type thing. Where instead of doing the actual work, you can do something else that doesn't really touch on the point of the work you are making up.
Justin	Horowitz	Pro-bono work should go towards CE, but not at a ratio. This causes more confusion than necessary as pro-bono work helps advance education. Being put

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		in unfamiliar circumstances and working with clients most CFPs don't work with exposes us to a lot of learning opportunities.
Brent	Horvath	Strongly oppose 40 hours.
Jim	Houghton	Seems like a good modification
Jonathan	Houk	I don't oppose allowing pro bono hours to count towards CE. I strongly support that. But I oppose the fact that it is a 3:1 ratio. This would not encourage additional pro bono hours but rather in my opinion would discourage further service.
Noah	Housler	Overcomplicates the process
Alec	Hubbard	CE in the current system is difficult to obtain without rushing to less than ideal providers. Therefore anything that makes it less of a burden for someone is good.
Joel	Huet	It would further incent planners to give back.
Lisa	Hunter	This will most certainly be abused. If the Board thinks there should be some kind of pro-bono work, require a certain number of hours or find another way to incentivize professionals to do. But keep in mind the professionals are all at different lifestages - someone starting a career & a family will be penalized -Time is not theirs.
Dave	Hutchison	I do not think another 10 hours is needed, especially for us with far more regulatory CE, but OK on pro bono if done. But no strong opinion either way other than not increase to 40 hours
William	Hytner	That's ridiculous whoever proposed this is just a person increasing our expenses and waste of time
Jacob	Ivey	Practice is good
John	Jacobs	Financial service professionals do not need to have 10 more hours of CE credits.
Richard	Janes (Charles Schwab)	See comment about current Schwab policy related to pro bono activities. We would not want to delegate supervision of this activity to the CFP Board.
Helen	Jardine	This could probably get tricky --what counts, who signs off, etc. If contributing pro bono financial planning is an initiative, perhaps send links out sharing opportunitites across the United States and promote it more and link CFPs to pro bono opportunities. It seems like there is a Foundation...I don't recall receiving specific emails activiely promoting and connecting CFPs with opportunities rather than having to search a site.
Dominic	Javier	NA
Carol	Johnson	No changes to CE are needed. I never had a client in over 35 years ask me what courses I took.
Mark	Johnson	This proposal runs counter to the other proposal of requiring certain specific CE. I also previously commented that pro-bono work would do very little to provide true planning experience let alone the opportunity for the practitioner to learn anything of value that might advance their knowledge/practice.
Annette	Jones	I'm curious how the CFP Board qualifies pro bono work. Is there, or will there be a checklist, per se, of actual activities performed?
Audrey	Jones (Financial Life Designs LLC)	Problem is how do you verify?

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David	Jones	I oppose 40 hours! Onerous!
Douglas	Jones	Again, this makes no sense. If its pro bono or in our work environment, its all about planning. why carve out pro bono and pretend its a part of CE? its not. 40 hours is too much. This feels like a way to allow that reality to be watered down by offering a non CE activity like pro bono planning to satisfy something.
Conner	Jordan	While I like the idea of rewarding pro bono, this is comparable to daily tasks if your main revenue stream is financial planning. Again I think there should be a tiered system and a CFP professional should take 30 hours if their main business is financial planning and 40 hours if it is not.
Kevin	Jordan	Pro Bono should be for the good of the public, meaning no conflict of interest for the professional. Don't incentivize pro bono. Otherwise it loses its meaning.
Mindy	Joseph	This proposal seems to move of in the direction of mandatory pro bono work through the Foundation for Financial Planning.
j	k	Pro bono service is a was of time. Frankly it would be unheard of if there weren't a fancy word for it.
Henry V	Kaelber	What is learned through pro bono services? Very little I believe.
Melanie	Kahrs	CE in my opinion should not include the opt out because someone does pro bono work. Someone should do pro bono work because they have the capacity time-wise and financially, and to support causes of course. But I believe this takes away from the quality of CE and waters it down. We all need to be constantly learning. I believe it waters down the CFP marks. That being said, I do think pro bono work is important. But there should be another way to encourage it. It reminds me of something we have at our employer where veteran FA's can do a partnership with new FA's and give them a portion of their book. But if they choose to do it with a new FA who is a minority they receive more in compensation. One should choose to do the right thing and support underrepresented populations but it is weird to compensate someone more for it. Whatever happened to just encouraging folks to do the right thing?
Michelle	Kaicener	Another method for changing 30 hours to 40 hours.
Matthew	Kalajian	30 hours...
Janel	Kalish	Still don't support the increased CE but if pro-bono counts for some, that would be good.
Amber	Kanzenbach	I would cap this at 5 hours of CE.
Hooman	Karbasion	Not sure this helps with CE. Don't agree with this
Jennifer	Karch	I think the ratio should be equal, but otherwise think this would help motivate people to do pro bono work.
Khory	Katz	Pro-bono and education are not the same thing. If you want to impose a pro-bono requirement, do that don't attach that to CE.
Ashley	Keamo	I disagree with increasing CE hours.
Kathleen	Kee	Anyone can sign off for probono hours.
Bernard	Kelly	I carry the CFP license but am not a practicing professional. Based on my current role within my financial services I am not approved to do per bono work.

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Mark	Kelly	I don't necessarily oppose earning CE through Pro-Bono, but I am strongly against any change to CE hours.
Patrick	Kelly	Pro bono work is too difficult to certify and monitor accurately for the board
Vera	Kelsey-Watts (Saltbox Financial LLC)	I mean, I think it shows how much you actually value doing 'real life planning' in the 3:1 ratio. I learn 5x as much in an hour of planning than I do in a 2 hour webinar. We offer pro bono hours to clients of ALL INCOME AND ASSET LEVELS AND COMPLEXITY - Pro Bono is not just because a client is 'poor' or 'simple' - so if I dedicate unpaid hours of time to in depth client support and planning, I appreciate for that to be considered CE, but you should at least let us get 1:1, because you know that advisors who do Pro Bono do more than 10 hours a year.
Kit	Kenny	30 hours is proper. I am opposed to the want by The Board to increase the CE hours.
David	Kinder, RFC, ChFC, CLU	More micro-management of CE requirements. Our job is to serve clients, NOT to keep ongoing track of all this CE!! You're going to have more of your certificant holders more afraid of not being in compliance on their CE by how it's tracked than by actually doing the job they should be doing!!! I'm strongly opposed for the principle of micro-management.
James	Kirkpatrick	Leave the pro bono choices up to the individual CFP professionals.
Ryan	Kittrell	I suppose that would help more people gain access to financial planning services. And the CFP holder would have an incentive to provide the pro bono work. Seems like a fair trade-off.
Craig	Kliebert	Pro Bono work and CE are two very different things. You should not be held to a lower educational requirement because of Pro Bono activity.
Alan	Kneale	This is aligned with my earlier comments on pro bono and other CE options
Michael	Knight	Pro bono work has a positive impact on competence.
James	Kobacker	If it's so important for CFP's to do 40 hours then people should have to do 40 hours. Cutting down on the time with charity work doesn't make sense.
Robert	Kocembo	1:1
Joseph	Kochera	This question is vague. Are we saying that personnel offering the Pro Bono training will get CE Credit for teaching? Engagement for this would be expensive to travel to get this training.
Henry	Koehne	I think Pro Bono work can be subject of over reporting, and think Pro Bono should be Pro Bono, not a value to reduce CE or get public acknowledgement. My Pro Bono work is mostly never known about and helping folks who really need it, and sometimes clients are not even told to give them a sense of dignity and value without knowing there is a charity involved. This is very personal to me, and I don't think it should be used for CE.
Brandan	Kools	if the goal is to have more effective financial professionals, don't drown us in coursework that we don't have time to digest properly. I have dreamed of editing the course material to make it more succinct.
Joel	Koon	I do not personally do any pro bono work, but I could see how this would in general net benefit the community. Allowing those who would not generally be able to

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		afford planning services to be able to take part. I would make the caveat that this pro bono work should not be allowed for direct family members. Otherwise, this will just lead to a lot of planners using their family for free CE.
Brian	Koonce	I didn't earn the CFP to work for free or to be encouraged to.
Paul	Kopey	I strongly support Pro Bono work. But I'm afraid this will be used to rationalize the increase to 40 hours, which as I explained previously I do not support w/o a change in what courses qualify for CE (i.e., CPE credits for CPA's). Also, I would like to think CFP professionals would not need this extra incentive to perform pro bono work. Lastly, this would become increasingly difficult to monitor if one does pro bono work outside the referral system of the Foundation for Financial Planning.
Brian	Korb	How does doing pro bono work increase one's knowledge and competency?? I oppose.
Jeffrey	Kostis	Pro-bono services and professional competence are different issues. The additional education requirement is either needed or not needed, regardless of the amount of pro-bono services being performed. Providing pro-bono service is not relevant to ensure that the CFP Professional maintains their competence.
Lucas	Kraft (Financial Planning Association of Wisconsin)	I support the general idea and have a passion for pro bono work. We need make this a part of being a CFP and require a certain amount of pro bono hours per year. I don't like the idea of 3 to 1. Make it 1 to 1, we want people to get more involved with pro bono.
Brien	Krank	Stop making things more complicated with things like this will now count for CE however, you can't carry it over. This is how our tax code became so cumbersome.
Ross	Krause	Like i said before pro bono hours should be encouraged and rewarded for us.
Scott	Krizek	Another onerous time requirement. CFP professionals have huge time requirements in their work. Adding 10 hours will not make them better and many like me may drop the designation
Austin	Kunzler	Too many moving parts to formulate a strong opinion.
Lars	Lambrecht	I do not think the CE requirement should be increased. It is plenty high!
Robert	Lamperti	free work and competency are not mutually exclusive
Chuck	Landgraf	I do not support this as it is assuming that the increase to 40 hours of continuing education is a done deal
Ryan	Landmark	That is not continuing education. If that gets CE credit, normal financial planning should too. It's my opinion that neither should get continuing education credit.
Jamie	Lapin	As long as it's 'allow' and not 'mandate.' Not sure why it should be 3:1, but I believe the opportunity makes sense.
James	Larson	No - that's not expanding your knowledge and keeping one sharp. One is simply doing their 'job as a financial planner' without remuneration.
Kevin	Larson	So theoretically we have to take CE to keep our skills current. But if a poorly educated CFP helps someone pro bono, and gives them bad advice because their skills are not current - then that is equivalent to a conscientious CFP studying to

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		stay current ? how does that help the profession ? Doesn't seem to make logical sense.
Brittnei	LaRue	I am unaware of how pro-bono education can be validated and monitored for efficacy and standard so I have no strong opinion to support this as a way to complete the CE requirement.
Daniel	Lash	I oppose the 40 hours so to would oppose this.
Steven	Latham	There is literally no reason to increase the number of CE hours required and the CFP Board has not effectively communicated the reasons behind this proposed change.
Laura	LaTourette	yes - good to do probono if possible for all - helps keep ppl engaged w/us CFPs
John	Laughlin	Legal concerns.
Darrin	Leaks	CE should be specifically targeted and approved for standardized training and courses.
Kristen	LeClair	This is just a method to drive more pro bono work. I do a lot of pro bono hours already, so this would help me. But, I see this as an underhanded way of driving pro bono work. Adding 10 hours to the 30 in place is not additive!
Jennifer	Lehman	You should allow pro bono service even if it stays at 30 hours. Otherwise, you're saying it's not real work, it's not meaningful, while at the same time you're encouraging people to do it. If it's meaningful, count it. If it's not meaningful, stop encouraging people to do it.
Michael	Lewis	seems like a lot of extra steps to track
Darren	Liberski	This seems reasonable to me.
Gary	Liberty	you have not demonstrated a need to increase the hour to 40 every 2 years.
Jason	Light	Pro bono work is not equivalent to ongoing education, however allowing pro bono work to count toward CE encourages this work.
Malcolm	Liles	Pro bono service does nothing to maintain professional competence and should not count as CE.
Leighton		
William	Liles	I strongly oppose increasing the CE requirement at all.
John	Link	Not sure on this one. Provided the Pro bono is legit, okay. So, need criteria on what counts as Pro bono hours.
Jordan	Liss	As i mentioned earlier i do not think the number of hours each period should be increased
Vance	Litchfield	No opinion
Houston	Little	Agreed. However, I think it would be right to do 1hr of pro bono service per 1hr of CE credit. Afterall, there is often more focus & learning through actual cases vs. in CE courses.
Guo	Liu	See my previous suggestion
Chad	Lively	Pro bono hours are great for the community. But they really won't keep you up to date on the changing landscape of financial planning.
Robert	Livingston	First - Don't increase the CE requirement to 40 hours. Second - Pro Bono hours do not improve the educational competency of the CFP Professional. Implement the proposed change would undermine the purpose of continuing education credits.

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Bill	Lloyd	Pro bono service should be done because a CFP professional wants to help people, not because the CFP board wants X number of pro bono hours to declare for promotional purposes. We don't need a pro-bono education course to tell us what type of pro bono work to do or a record keeping system to report and track the activity. Too much micro-management. However, I do think a referral system could be helpful linking advisors to specific areas of need.
Ken	Logan	Seems like it's more designed to push Pro Bono. I don't dislike Pro Bono but I'd limit the amount of crossover. I guess it's ok so long as it is not penalizing folks who don't choose to participate in Pro Bono. Might as well add it in for the current 30 hour CE requirement if that is the case.
Noah	Londer	Support
Paulo	Lopes	I support the proposal to allow up to 10 CE hours to be earned through pro bono service, as it encourages CFP® professionals to give back while maintaining their education requirements. My only concern is ensuring that the CFP Board's reporting system accurately tracks these hours, including the pro bono service-to-CE ratio and required coursework. Assuming proper implementation, this is a valuable initiative that benefits both professionals and the communities they serve.
Pamela	Lorenz	Pro bono services are not the same as taking exams
Ted	Loughry	Don't increase the CE requirement!! PLEASE NO!!!
Eileen	Loustau	Just being completely honest that the pro bono work that I do is so easy that I do not think it should count as education. It is all budgeting and cash flow and I'm not 'learning' anything
Alicia	Love	Pro bono isn't really available to me so I feel put at a disadvantage with this change.
Kristina	Love	I like having more than one way to get things done
Eric	Lowder	If your going to increase it to 40, I feel half of the hours should be allowed from pro bono work.
David	Lowe	I support the concept but think the ratio should be two hours of pro bono service per one hour of CE. Practical experience through pro bono service is just as valuable as book/webinar learning, so there is no need to require a high service-to-CE ratio.
John	Loyd	I STRONGLY OPPOSE increasing the CE required hours. However, 'if' that comes into play, yes, allow pro bono hours to count.
Alejandro	Lozano	yes, but better promote pro-bono opportunities.
Christina	Lynn	Pro Bono work is about giving back, it doesn't help you stay current with relevant financial changes or review.
Adam	Mackall	I understand the thought of increasing pro bono work, but what education is coming from this for a CFP(R)?
Stephen	Maggard	CE and pro bono work are two separate issues and, in my mind, should not be combined. This seems like we are trying to up our reported pro bono hours by incentivizing them as CE.

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Frank	Maggiorotto	Do not support increase. Why have a ratio vs. one for one???
Drew	Magll	Yes, allow more pro bono hours to count to both CE and toward the 6,000 hrs initial requirement. The number of people who need FP help is growing faster than the number who can afford it, imo. CFP board has an moral responsibility to help address this...
DJ	Mahler	There is no new learning by doing pro-bono. CE should remain intact
Bonnie	Maize	I'm in favor of nearly any proposal that increases pro bono service in our profession. We have to get CFP professionals out into communities and away from only serving the wealthy. No other profession works this way. Everyone can benefit from financial advice, yet our profession focuses on the most wealthy. This has to change to be taken seriously as a profession.
Stephanie	Malewski	1:1 ratio
Dan	Malone	Too much opportunity for abuse in reporting time spent on pro bono activities.
Mason	Malozzi	N/A
Josh	Mancell	I only disagree with the ratio. I don't believe an entire day devoted to assisting in the planning process is 2/3rds less important than spending 3 hours in a lecture. Especially when it's for CE.
David	Mannaioni	I very much support pro bono planning, so this is a good addition.
Joseph	Manno	Why are Pro Bono hours somehow worth less than one hour of CE? Why not allow for Pro Bono hours to be equal to CE hours? Don't we want to encourage our CFP professionals to help others?
Santo	Marasco	CE is CE. Planning is not CE, it's planning. I agree that pro bono is important work, but allowing this is unfair to CFP professionals who are not in a position to do pro bono work, either through occupation or through financial/business capacity.
David	Markle	My experience with pro bono service is that it is on the low end of the financial planning knowledge base and it is not indicative of the knowledge and experience needed to deal with complex financial planning areas.
Carey	Markoe	Strong incentives to help those in the community that might not otherwise get support from a CFP.
David	Marotta	The minimum CE requirement is currently set at 30. This suggested change is being coupled with a change that 10 hours of pro-bono service. I provide many unreported hours of pro-bono service. Requiring me to document those hours and then report them is just more useless and prideful paperwork, which I strongly oppose. Why increase the hours to 40 and then make 10 of them self-reported pro-bono service. More reporting and more documentation does not make the profession better.
Kenneth	Marshall	But how does one qualify pro bono work? For example, as a CFP I don't receive any financial support for my pro bono work. However, a JD, working for a law firm, still gets paid. Is that fair? Should contributing donations to the CFP count toward pro bono work?
Leo	Marte	Mixing pro bono and CE further dilutes the case for a higher CE requirement and the effectiveness of it. If one can forego 10 hours of training by giving pro bono

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		advice, then what is the importance of those 10 hours for improving skills? This increases the look of increasing the CE requirement as an arbitrary number and to an extent a back-way to push for more Pro Bono hours, which should always remain optional.
Bruce	Martin	There's that 3 to one ratio again - and that proves my point. Quit stealing our time and give us credit for actual time taken out of our existence.
Maria	Martin	CE is defined as continuing education. Client service and meetings does provide more experience and pro bono work does offer a more diverse experience for many professionals. However, it is not specifically education and it is not necessary for daily work. Education and understanding new strategies, laws, regulations, investments, etc. is necessary for daily work.
Barbara	Martinez	I support the proposal to require pro-bono-specific education for participating CFP professionals. Ensuring that practitioners receive training tailored to the needs of the communities they serve will enhance the effectiveness of pro bono efforts and ensure that recipients receive high-quality guidance
Mitchell	Mass	Anyone willing to give time back to those in need earned this and possibly more.
Kevin	Matthews	I spoke about pro bono before and my opinion is that we need this to be stronger.
Katherine	Maxwell	Again, why 40 hours for folks like me who have had no ethical, legal or regulatory black marks for 30-40 years of being in the profession? I do like the pro bono option as a way to earn CE.
Ronald	May	I oppose the 40 hour requirement so de facto oppose this.
Rick	Mayo	Too narrow and not generous enough. Pro bono should be hour for your, also add in practice management to count toward 40 hours, AND as proposed before, let 10 hours roll over from period to period
Noah	Mazur	I would not likely partake in this activity.
John	McAvoy	The FPA should be included as part of the Pro Bono effort. Many great Pro Bono programs started at the FPA chapter level. For example, the annual training that the FPA of New England does with Dana Farber should be part of this program. BTW, Pro Bono service credited for CE should not be contingent on expanding the necessary CE hours for certification.
Christopher	McCauley	i hope we don't go to 40, but I like the pro bono angle
Jeffrey	McClure	If that provision is enacted, then the certificate should be required to submit a written verbatim description of what the pro-bono service entailed.
Elizabeth	McCollum	I think it's important to continue to update skills and knowledge, and ongoing pro-bono work does not accomplish that goal.
Steve	McConnell	It doesn't make sense to conflate these two separate topics. If the CFP board wants to impose a pro bono requirement, it should just impose a standalone pro bono requirement. Combining CE with pro bono just weakens CE.
Jack	McCormick	I think pro bono is good and helps all parties involved.
Kyle	McCune	Yes, I think pro bono is good for the profession.
Justin	McCurdy	Pro-bono is not CE, keep them separate.

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Jessica	McDonald	Pro Bono work is important, but that seems like a proposal to get out of participating in Continuing Education.
Catherine	McDougall	Unless you have a way to verify this work it seems like just like the Professional Experience requirement you are relying on the ethics of the CFP/CFP candidate reporting it. Seems like to truly verify this the cost to the board would be too much.
Ryan	McGhee	It sounds good but how do you track it?
Thomas	McGrath	Disagree with this, it is a time commitment and an hour is an hour. This seems contradictory to the other proposal of wanting to substitute pro-bono hours for the pathway to certification.
Alan	McGrew	Do not think going to 40 hours of CE is needed. Best NOT to speculate further on a requirement until it has been approved. Gives the impression that the Board has already made up its mind on this issue of increasing the requirement to 40 hours every two years. If this is the case, why ask for our input? Nothing in this proposal if the decision is made to remain at 30 hours for every two years. Would support if it allowed 5 CE hours to be earned for Pro Bono work if CE requirement remains at 30 hrs. every two years.
Aidan	McGuire	No opinion on this proposed change
Tricia	McIntosh	Allowing pro bono to count as CE, even at 3:1, encourages pro bono. Pro bono is personally fulfilling, it would expose the CFP to a broader client base and it enhances the reputation of the mark and the professionals who bear it.
Ben	McLintock	I do not know how you could effectively monitor or verify qualifying pro-bono activities to satisfy this substitute for attending traditional CE offerings.
Andrew	McNally	and here begin the complications. You'll end up with a page of FAQs explaining it and a ton of emails with questions about it. You can't ask people to do the math. Someone will not get all their CE in because they didn't understand it (yes scary since they're advising people on money but you know this will happen to someone).
Jared	McNee	Pro bono work does not provide education on new topics, laws, etc. Including pro bono does not make sense.
Kiernen	McTaggart-Ivezic	Proposals for CE in pro Bono are helpful but offer limited CE as it is not being taught, more learnt on the job.
Jeffrey	Menough	Pro bono should not have anything to do with CE. Using pro-bono work to strong arm people into competing CE hours is terribly un-acceptable. Nothing wrong with pro-bono, but it should be a choice and not a mandate. This policy starts a slippery slope to mandate.
Greta	Messarra Woodward	sounds good, but again how would they measure and record this metric?
Christine	Messmer	There is no difference in providing financial services pro bono so why would there need to be a course?? Makes no sense to me.
Alison	Mewborne	again pro bono is hard to verify and most of the time is budgeting only...not full financial planning

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Cynthia	Meyer	Why 3 hours of pro bono work for 1 hour of CE? I thought the goal was to INCREASE the percentage of CFPs who do pro bono hours. I would support this if it were 1 hour Pro Bono work = 1 hour CE with a max of 12 pro bono hours per reporting period (1/2 per month over a two year period of someone were volunteering regularly.)
William	Meyer	If ce is too learn current topics, pro Bono work is likely in very simple plans where nothing is learned
David	Middleton	Leave the CE requirement at 30 and allow up to three CE hours to be earned with 9 hours of pro bono work.
Michelle	Miles	Not everyone can afford a CFP. I think this is great outreach.
Aaron	Miller	The 40 hour requirement is strongly opposed and pro bono hours do not increase our knowledge (mostly increases people skills). Intellectual coursework is key to help our clients long-term and we should be constantly sharpening our minds.
Dan	Miller	Difficult to track and verify. Stay at 30 hours as it is currently!
Frederick	Miller	Pro bono advice is not CE. Imagine a lawsuit against a CFP professional for incompetence, and it turns out that that professional earned 10 hours of CE by delivering 30 hours of pro bono advice. Enormously bad PR.
Jared	Miller	Don't increase to 40 hours CE.
Maureen	Miller	Sounds nice but would like to see data on how many professionals and CE hours this would affect. Also sounds limiting in the trial basis
Patrick	Miller	doing free work is not the same as refreshing topics we havent seen in a while or learning something new
Rodd	Miller	If you are trying to incentivize more pro bono service then I'd recommend you flip it around and have 2 hours of CE for every 1 hour of pro bono service.
Steven	Miller II	Do not increase the CE. Quality CE over Quantity. 30 credits is already very monotonous.
Ronald	Mims	N/a
Michelle	Minisci	This may become a logistical nightmare to prove what kind of pro-bono hours were completed and will eventually negate the benefit of focusing on providing financial planning to everyone - even those that cannot afford it. I would focus on providing another incentive to fix the problem. Perhaps a discounted renewal rate for those actively providing pro-bono financial planning to their community.
Aaron	Misenheimer	How will Pro Bono be measured? Many firms may not have a plan in place to allow Pro Bono work.
John	Mitchell	While I do pro bono services. This is not the way to manipulate the CFP's to do pro bono.
Lucianna	Molinari	Oppose increasing hours. Pro Bono work should be accepted One for One if it is not currently.
Edward	Molloy	Do not agree with the 40 hour CE standard nor the 10 pro bono
Michael	Montante	So you want me to GIVE away 30 hours of my expertise, undermine the value of our industry to just get 10 hours of CE. That is just a lousy deal all the war around.

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		Talk about shooting myself in the foot. I have a family to support. I do not need my licensing organization to work against me.
Kyle	Moore	No, the board should not be creating policies to incentive us to provide free work while also raising fees we have to pay to the board.
Callie	Morgan	I support this, however why not allow a carryover?
Scott	Morley	Good plan on paper, but cautious how many people will plug in fake pro bono just to get the CE credit.
Katrina	Morris	Depends on the quality of the Pro Bono work.
Ian	Morrison	Pro Bono CE is most of what I do to learn. I much prefer it to the basic CE that is often offered, it tends to be more comprehensive and sometimes cheaper.
Caden	Mumford	I just think this is unnecessary and further CE is ridiculous.
Kahlela	Mungin	None
Evan	Murphy	see prior pro bono comment
Jillian	Murray	This feels like a poison pill. I feel that pro bono service should fulfill CE at a 1:1 ratio. I certainly feel like I'm better serving my community and sharpening my professional skills helping people prepare their taxes or teaching a financial literacy course than I am sitting in another current events seminar or clicking the next arrow button on vapid, revisionary e-learnings year over year. Why bury a high ratio and the inability to roll over these hours specifically in this proposal?
Audrey	Myer	We all do pro bono work regularly with clients. I feel like this requirement would be fabricated by some reps just to hit the 40 hours needed. I.e. I have 30 CE credits and it's near renewal time, I'll just say I did Pro-bono work to hit the mark. While we are all professing to be ethical CFPs, there are some people that would twist the rules on this area.
Lori	Nadglowski	Isn't the purpose of CE education? I don't see how pro bono hours fits. If you want a pro bono requirement then look at that as an additional requirement.
Shamiah	Naff	Who is supervising this?
Randall	Nakamura	Don't increase the CE to 40 hours every two years. More is not better! Let us really focus on the specific needs of our clients and put in the work towards those specific areas. I don't want 20 different required courses where some of them do not apply to my practice.
Frank	Napolitano	Mostly because I'm opposed to the increase to 40 hours. But I also prefer the idea of keeping pro bono work separate from CE.
Jeffrey	Neavor	Don't increase the CE hours.
Gregory	Nebel	More regulation to pander to the pro bono God. Many people support the industry in charitable ways that would not fit the description of Pro Bono. You cannot mandate charity, or it is truly meaningless.
Devin	Neitzel	Pro bono service does not mean you are doing continuing education. I could do pro-bono tax work and gain absolutely no education from doing so. How would this be monitored anyways?
Dennis	Nelson	I support this but, again, I wonder how the pro bono service can be reliably verified.

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Stacie	Nemetz	Providing pro bono planning does nothing to support the ongoing development of necessary skills to deliver excellent client financial planning services.
Jordan	Neuschwander	I feel pro-bono work is a positive way to give back to the community and support it counting towards CE.
Jeff	Nevlida	If Pro Bono is going to be supported, it should be supported without restriction or limit.
Jacob	Newcomb	Get more good done in the world. I support
Santine	Ngwe	Good idea
Sara	Nicholson	Pro bono work is not continuing education. It's volunteer hours.
Timothy	Nickas	Pro-bono work should be done because you want to do it. No CE incentive should be given. I believe it takes away from the spirit of the work.
Ilie	Nistor	30 hours pro bono seems too much
Doug	Noble	pro-bono work is not the same as CE.
Douglas	Noble	This does not maintain competency. If the goal is to maintain competency, this is a gift for those who do lots of pro bono work. It sounds like the CFP(R) board is trying to force us to do more pro-bono work.
Stephen	Noblin	Pro Bono Work is no substitute for continuing education. Pro Bono Work should be at the discretion of the professional, and should not be considered a substitute for education.
John	Northrop	Meh...I like the idea but I wonder how often it will be utilized by CFPs(R) in the profession. If it is being used to increase the amount of pro-bono activities, I can see that but pro-bono work should be done 'pro-bono'.
William	Oakland	not sure why the CE isn't eligible or carryover? it's either CE or it isn't.
Celina	Ochoa	Pro bono service should not qualify for anything related to CFP® standards or eligibility.
Anne	Oestriecher	Pro bono work is no substitute for learning new information. The two goals should not be linked.
Cherry	Ohms	Suggest to earn through pro bono service at a rate of two hours of pro bono service per one hour of CE.
Robert	Oliver	I understand the intention here, but I don't see how providing pro bono services should count as CE.
John	Oluwaleye	CFP Board's Code of Ethics and Standards of Conduct requires CFP® professionals to uphold the principles of integrity, objectivity, competence, fairness and confidentiality. They make a commitment to CFP Board to put their clients' interests first at all times when providing financial advice.
Thomas	Ouimette	I oppose because it makes the CFP Board track something else which adds to cost.
Melissa	Paddock	Pro bono work is not the same as completing continuing education. Those should be kept separate.
Jason	Palmer	Given we as a group are trying to encourage more Pro Bono Service hours, this proposal makes sense, especially as a trial basis. To clarify, one would presume that the Pro Bono ratio would not carry over but that there would be other CE

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		available, up to the proposed ten hours, that would carry over. However, I believe that ALL time, up to the proposed ten hours, should carry over to the next period REGARDLESS of the nature of the CE. This would be the proper incentive to perform MORE Pro Bono work for the greater good.
Jacob	Paltzer	Just like anonymous gifts, I don't feel like I need to report to the CFP Board everytime I work pro bono. This is just a way rack up more CE to advertise to the public
Jonathan	Panning	Pro Bono should be totally separate. It doesn't make sense for it to count toward CE requirements.
Jonathan	Panzica	This helps engage the community but it does not necessarily help learning
John	Parrillo	If you insist
Jeff	Pasternack	No comment
Jammy	Pate	Experience doesn't replace education or the other way around.
Michelle	Patel	What does pro bono work have to do with continuing education? Why not allow our daily work to count for CE? Again this is misguided. Seems corporate driven with larger corporations not wanting to allocate time off for their employees to do pro-bono and CE...
Christian	Patterson	Similar to why I believe pro-bono work should not be counted towards experience requirements, this should not count towards CE either as I do not feel there are many learning opportunities with pro-bono clients due to the typical depth of the work.
Jason	Peck	Seems to make it more complicated.
Julia	Peloso-Barnes	I oppose the proposed change as written, but would support the concept with some modifications. I suggest making this available after the first renewal period (so it is only available to more experienced CFP professionals.) Another option would be to make class participation a requirement for certificants with less than five years as a certificants if they want to get CE credit for pro bono service. While promoting Pro Bono service is desirable, less experienced certificants providing unsupervised financial planning services could create more risk both for clients and the profession. With any of these modifications, or others that would provide some additional protections for the public relative to less experienced CFP professionals I would support this proposed change
Trent	Perry	Yes, this is a good recommendation.
Kris	Persinger	No. This is a step in the wrong direction. Prove this helps solve a problem.
Laurie	Pertile	This Proposed Change clearly indicates to me that the Board is preferring the independent advisor versus the employee advisor who may have a firm requirement that does not allow Pro Bono hours in our profession. My firm specifically does not allow this with the exception of working with minors on firm financial literacy which I do not consider financial planning.
Jon	Petersen	This should be considered separate from the 40-hour proposal. If the CFP Board wants to promote pro bono work, this is the best way to incentivize that work today, at the current 30-hour CE rate.

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Kenneth	Peterson	I need more details on how this would be implemented? Are there multiple courses for different activities? Who certifies them?
Jack	Petras	Extra hours should be allowed to carry over regardless of if you increase the number of hours to 40. CE is CE.
Russel	Phelps	pro bono service is not continuing education. They are totally different and should not be commingled.
Jim	Phillips	Expand pro bono to apply to experience as well as continuing education. Facilitate (mentored) pro bono opportunities to help CFP candidates achieve the experience hours requirement. Use existing programs, like Hannah Moore's externship, to channel CFP candidates seeking experience hours into pro bono opportunities. You could probably make use of your existing job board technology to make this happen. Incentivize the mentoring side of it too so that CFPs want to mentor. Multiple ways to do this. Contact me if you want to discuss more at pacificjim12@gmail.com.
Susan	Pilon	I'm neutral because I don't support the extra hours. I do think pro bono should be supported. Not sure why it wouldn't carry over or be 1:1 especially if there is an education course involved.
Michelle	Pimentel	This reduces the amount of experience required of CFPs and therefore risks diluting the prestige of the CFP(R) marks. If the goal is to incentivize pro bono work (a terrific goal!), I'd much prefer to see reduced registration/certification costs or some other recognition of pro bono efforts. If a certain number of hours of education have been determined to be necessary/desirable to be competent planners, let's not short-change our future clients by certifying individuals who don't maintain the necessary education. I am very much in support of the pro bono education course and encouraging pro bono work, just not counting it as more 'hours' than it is (ie, the 3:1 ratio).
Daniel	Pinard	1) Don't increase the CE requirement, and 2) pro bono is not CE. Stop pushing your pro bono agenda on CFP professionals.
Natalie	Pine	Through a recognized provider
Kevin	Podell	This would make it easier to reach the CE target while also provide added value to the community.
Susan	Pool	I believe that this incents the wrong behaviors. Volunteering to afford yourself relief from a requirement is likely not a good experience for the beneficiary. It is also wrong to assume that your certificants are not providing valuable volunteer service in the community in areas other than financial planning. My service to local boards is no less significant because it is not providing financial planning and is a role I assume because I believe in my heart that I should give back to the community that has afforded me a living and great quality of life. Volunteerism should be borne of a desire to do good, make a difference and not as a bargaining chip for CE. I strongly dislike the sense that this is a way to drive the number of Pro Bono hours for the CFP board's marketing purposes.
Bruce	Popper	I hate the 40 hour idea. It is overkill. Again, what is trying to be accomplished with that? I would hope that true CFP professionals are staying on top of their

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		education as it applies to their areas of practice and interest. 30 is plenty. I don't know of another designation that requires over that amount.
Bruce	Porter	You are conflating two non-associated issues. This is just a dishonest attempt to strong arm advisors.
James	Powell	I would like to learn more about how pro bono service would fit in. For example, teaching a high-school or college-level class on financial planning should qualify.
John	Power	Encourages professionals to do the work for society. Rewards them and advances the profession.
Luke	Powers	DO NOT INCREASE THE CE REQUIREMENT.
Hunter	Prasch	I think this incentives volunteer work among CFP professionals.
Jacqueline	Price	No objections
Jeffery	Price	I do not see the correlation between pro-bono hours and continuing education hours.
Beverly	Provost	Would prefer not to increase it to 40 but definitely approve of counting pro bono hours towards CE requirements. I learn a lot by doing pro bono and it makes me keep up with changes and review topics and areas that I wouldn't do otherwise. I am more well rounded and in touch with the situations of people who are not high net worth from doing it.
Loyd	Pyle	This cheapens the pro bono experience by making it a bargaining tool. Sounds like a backdoor way to support the FFP at the expense of all CFPs.
Melissa	Pyle	I would imagine that for it to count as continuing education hours, there would need to be significant parameters placed around the activities performed pro-bono, and not just ANY pro-bono service should be counted. That seems very difficult to regulate.
Richard	Raff	Performing Pro Bono services is not relevant to CE requirements. The two areas should not be blurred or combined.
Michael	Ragsdale Jr.	DON'T RAISE THE CE REQUIREMENT!!!!
Liz	Raleigh	I am not opposed to the idea, but the 3 to 1 ratio seems harsh. It does not send a good message in terms of how the Board values pro bono work.
David	Raney	No opinion.
Lawrence	Ransom	Don't love the carryover but agree with the increase.
Alan	Ray	You're going to have to induce pro bono work in other ways.
Christopher	Reaney	I would need to hear more details but it sounds promising
Robert	Reay	I love it!
Max	Recker	1 for 1 hour would be the most logical
Michelle	Redding	I am sure I understand what this means.
Bryan	Regalado	I don't understand the proposed change.
Lora	Reinholz	would you also allow teaching hours for courses in CFP Registered programs?
Daniel	Rendler	I disagree with forced Pro Bono and forcing hours of CE to make it look like we are doing something. If people want to make an impact it shouldn't be forced. Upping our CE is a waste of time and seems like a money grab on the part of the CFP board.

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Chad	Reynolds	This feels needlessly complex and I have to admit I really don't understand it.
Jacob	Rhodes	No opinion
Loredana	Rickard	I have no opinion either way. I am not opposed, though.
Jonathan	Ritter	I strongly oppose allowing up to 10 CE hours to be earned through pro bono service, especially if the required CE hours are increased to 40 every two years. The purpose of Continuing Education is to ensure CFP® professionals remain current on laws, regulations, and technical knowledge needed to competently serve clients—not to serve as a vehicle to promote pro bono work. Pro bono service, while admirable and important, does not provide the structured learning CE is designed to deliver. This proposal feels like an attempt by the CFP Board to push pro bono work onto certificants because their efforts to encourage voluntary participation have not been successful. Turning to mandates to achieve this goal is counterproductive and risks alienating professionals even further. Many CFPs already feel burdened by rising costs and time commitments, and forcing pro bono service into the CE framework will only deepen frustration. If the goal is to promote pro bono work, it should be incentivized or recognized separately, not forced into a system that should remain focused on meaningful, education-driven development. This proposal, combined with the misguided increase to 40 CE hours, risks diluting the integrity of the CE requirements and pushing professionals away from the certification entirely.
Otto	Rivera	I think is this a great way to incentivize Pro-Bono financial planning while helping CFP Professionals meet their CE requirements. it's a 'win-win' situation.
Matthew	Robb	This is too complicated to keep track of.
Frank	Robertazzi	I resent being forced to do charitable work
Beth	Robillard	see prior question, appose the 40 hour change
Jody	Robinson	No!! CE is not pro bono and pro bono is not CE... bad precedent.
Blake	Robson	This could be a big help to those that need advice and cannot afford it.
Charles	Rocco	This doesn't seem like a strong incentive and adds complexity. Why wouldn't it be hour for hour up to the cap?
Dylan	Roche	Doesn't make sense to me
Nathan	Rockholm	Now we are just adding things in here to make things confusing. Make this requirement straight forward and dont add all kinds of stipulations.
Karl	Rohrbaugh	Any increase in required hours I am strongly opposed to. However, allows some hours to come from pro-bono activities could be useful. However, I have experienced this with other certifications and the approval process for such activities was arduous. This would need to be implemented in a streamlined, easy to understand, easy to submit platform.
Jason	Romano	Pro bono work is not widely supported within our industry.
Charles	Rose	Pro Bono is not education. Its nice but should be separate.
Robert	Ross	This is another nice encouragement and support of Pro Bono service.
David	Rowland	I support this - another good idea. It will help me do something I want to do more of - pro bono work helping others.

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Marsha	Rubin	Please see my earlier comment on pro bono 'work' as 'experience'. Are we a profession, or not?
Patricia Ann	Rudy-Baese	3 hours pro bono + 1 CE is too few hours. 10 to 15 would be more equivalent.
Shelbi	Ruffino	I don't agree that 3 hours of pro bono is only 1 hour of CE. Instead cap the number of CE hours that can be earned through pro bono work.
Gregory	Ruley	Makes sense if you end up raising the CE requirement, even though I prefer not to increase the hours.
Michael	Rundlett	I am opposed to increasing CE for anyone over 5 years real experience. I am okay with allowing some CE to be earned through pro bono work.
Joshua	Russ	Offering CE hours in exchange for pro bono work makes it a win-win-win situation. A win for the people needing help, a win for the Foundation in getting exposure, and a win for the professional.
Chris	Russo	I don't support at all the increase in CE hours and I don't understand why the board would penalize pro-bono work. Why wouldn't pro-bono hours working on financial planning count one for one for CE. This proposed change does not make sense to me.
Gary	Rychtanek	Literally no opinion.
Amanda	Rysiewicz	Seems appropriate and gives back to communities
Jason	Sabaugh	This suggests that philanthropic/pro bono work further affirms that a CFP professional is 'current' on financial planning standards and updates vs doing whatever the actual hour requirement is? That doesn't make any logical sense. This implies that CE's are simply a 'requirement' or 'task' (which most professionals candidly view them as) and if you simply give back to the community, you can sidestep that requirement. While well-intended, there are lots of ethical dilemmas here.
Joseph	Sachetta	No comment on this level of detail.
Siegfried	Saftner	If the recommendation to increase required CE hours is accepted, I believe the CFP board should make it as easy as possible for CFP professionals to attain those additional required hours.
Brady	Sahnow	Real experience should count if the minimum is requirement is raised.
dennis	sakurai	We need to give back to the community especially the group that can't afford us or understand financial planning.
Melissa	Sanchez	People find pro bono activities in different avenues and I disagree with having the board dictate how it is found.
Albert	Santaella	I agree with everything except for raising the number of CE hours to 40 hours. Most CFP holders have other licenses which require just as many additional CE hours as the CFP.
Tom	Santi	Pro Bono and CE are two separate topics. Don't combine them.
Nathaniel	Sarkar	Pro Bono services could lead to individuals giving financial advice outside their capacity in their roles and open them up to litigation as a representative of their employer.
Seth	Sartain	CE and pro bono serve two different purposes.

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Laura	Satin	The more we can provide educational and pro bono opportunities, the more the public can benefit. The enhanced visibility of the CFP® Certification and its benefits to clients can only become visible when more people work with CFP® Professionals and Candidates for CFP® Certification. Plenty of people who could otherwise not comfortably afford a CFP® Professional's services would enthusiastically sign up for services not only for their own benefit, but to help an aspiring CFP® Certificant with gaining their practice experience. I would stress that the Pro Bono hours should be done under the supervision of a competent CFP® Professional or CPA, Attorney or similar professional already authorized by the CFP Board to validate the hours contributed.
James	Saulnier	If someone wants to do pro-bono let them. If you want to give credit, that's fine. But don't allow this, and then NOT allow me to carry over 10 hours. For a variety of reasons I cannot do pro bono, don't penalize me for that.
Rob	Schaefer	I think this is a good method to have higher PB engagement
Kyle	Schau	Doing work pro bono doesn't make you a better CFP, so doing that instead of CE doesn't help further the cause.
Charles	Schillicci	Would only agree if the pro bono work is 1 hour to 1 hour.
Margery	Schiller	Pro bono work should count to incentivize this type of help. I would consider 2 hours pro bono for 1 CE credit to be sufficient. Time can be limited for those working in our field especially if they run a independent practice. 3/1 could make participants do traditional CE instead of pro bono.
Kurt	Schindler	I only support if done through the Foundation for Financial Planning.
James	Schless	Defeats the purpose of CE. The focus on pro bono smells like a marketing gimmick.
Daniel	Schmitz	Fine for a stick to incentivize the behavior desired by the CFP board but seems off base to actually correlate this to CE.
Joe	Schmo	I oppose any increase to required hours.
Donald	Schneider	How does Pro-Bono hours replace the need for CE? If we accept this standard then we should also be allowed to submit CE credit for completing the role of being a CFP professional by working with clients.
William	Schretter	Pro-bono should not be a replacement for CE. You do not necessarily learn anything new via pro-bono. Very difficult to track if the pro-bono time is quality learning time, or did the CFP just sit at a table waiting for a public member to ask questions. CE is about learning new skills.
Nichole	Schurr	Leave the Pro Bono hours as voluntary and do not complicate them. Putting restrictions on pro bono work will discourage this activity.
Adam	Schwartz	Don't increase to 40 CE hours. Leave CE at 30 hours and allow 10 hours of pro bono to qualify for 10 CE credits 1 for 1. Encourage the pro bono work while ensuring legitimacy.
Byrke	Sestok	Pro bono planning is very educational. Helping people who likely need it most, for free, can transform lives. The CFP Board should encourage certificants serve the underserved.

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Viney	Sethy	See my previous comments.
Renee	Sewall	Good to encourage pro bono
Amy	Sharp	Pro bono work helps those in need.
Cameron	Sharpe	Seems like a good idea as it promotes volunteer work and also practical training and CE.
Gary	Sheller	This makes no sense to me. This would appear to me to be an attempt to establish some social engineering technique to cause more pro-bono efforts to be put forth by practitioners. Is that really your goal? How does this reflect competency?
James	Short	Keep it simple.
Tyler	Simonds	I believe this to advocate for the Pro Bono program, which I support. This also shows the importance of the pro bono system in offering planning to underserved people
Joy	Slabaugh	If you're going to do this, why isn't it a 1/1 hours served to hours gained? This level of complexity in the CE hours that you are introducing is nearing absurd. This is making me feel even more strongly you should entirely do away with the CE requirement.
Martha	Sluka	Per my previous comment I am not in favor of the increase in CE hours, however I do support the pro bono hours being used towards CE hours, I would just prefer the hours to remain at 30 hours per reporting period. When working with any client you are going to need some research to prepare which adds to the education of the planner. Also this would allow planners to support pro bono work and complete CE's as well, giving an incentive for the time you are putting in.
Christopher	Smith	No. More. CE. Under any circumstances.
Garrett	Smith	Experience and education are 2 completely separate things, so I do not support counting one as the other.
James	Smith	See comment on additional hours
Kathleen	Smith	I support this in theory, but would seek additional information on the availability and quality of 'pro bono education courses'
Roger	Smith	If the rules apply to area outside of my practice I shouldn't be required to study
Susan	Smith	30 hours of CE should be sufficient, PRO Bono is likely are part of many practitioners and shouldn't have a special 3 for 1 exchange for the hourly requirements
Eric Brian	Smith, Jr.	You guys are taking this pro bono thing too far. Plus, how do you prove you did the pro bono hours? If a certificate can just declare they did pro bono hours then why wouldn't they just be able to declare they completed other CE. This makes no sense.
Ken	Soren	I support Pro-Bono. This provides further incentive for CFPs to do pro bono.
Fred	Soule	Encouraging Pro Bono is a good idea
Kathleen	Spahr	Most of my work is pro-bono and I do not need to attend a seminar on how to consult to my pro bono clients.
Jason	Spears	i still dont agree with the 40 hours of CE and attaching this only seems like you're trying to push us to offer 30 hours of pro bono services to hit the CE target.

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Rick	Speicher	No reason to increase.
Michael	Spelman	see prior 40 hour comment
James	Sporrer	Pro Bono service is experience rather than education, should not be both
Brett	Spurr	Pro bono is NOT continuing education. It is the practice of our profession, of actually giving advice. If you want a pro bono requirement, make one (though I am against that too given it prescribes how we spend our time and takes away from actual business). But let's not conflate continuing education with delivering advice. It is not the same and should not be some gimmick to increase the number of CE credits/hours.
William	Stade	why not just one for one. Again, adding burdens to people who are already incredibly busy serving clients.
Albert	Stanton	Seems fair to me especially with the pro-bono hours of service being counted.
Jael	Stebbins	This is a very reasonable accommodation to allow pro bono work to be completed and count, while providing a natural avenue for CFP to promote itself and the good/ethical work CFPs complete.
Adam	Stempel	I question enforcement and auditing of this process.
Laura	Stern	I oppose the 40 hours requirement and I also do not accept that pro bono service is equivalent to CE.
Matthew	Stewart	If you move to 40 hours, then allowing pro bono activity to count would be supported by me.
Scott	Stewart	I can't even really find any Pro Bono opportunities that are local, but I strongly oppose the implementation of 40 hours of CE. Full stop.
Amber	Stoll	Pro bono is great but it's not a substitute for continuing education. Continue education is for learning and staying up to date. Pro bono is for practicing and demonstrating that learning.
Kevin	Stone	Do not increase the required amount of CE hours to 40!
Eric	Strom	pro bono service is not CE.
Bryan	Strong	I believe the 3:1 ratio is too extreme; 2:1 or 1.5:1 seems adequate. I also believe excess pro bono hours should be allowed to carry over: we should get credit for the work we do, paid or not
David	Stroud	This is a creative idea and I appreciate the efforts, but a maximum 2 hours pro-bono service per 1 hour CE credit should be implemented, if the CE requirement is increased to 40 every two years.
Cherie	Stuece	This is a dilution of the purpose of CE - continuing education. I am a big fan of pro bono work, especially for households that would have access to qualified guidance. I do as much pro bono work as my schedule allows. If you want to require pro bono service, then do not muddle the requirements of carrots and sticks. I feel this blurs the lines of the purpose of a requirement for both CE and for pro bono work.
Michael	Sullivan	Absolutely, I'd like to see more support for Pro Bono service and in general service to clients of limited income and assets that is not purely commission and insurance based.

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Monica	Sullivan	Pro bono work is not the same as CE.
Alex	Sutherland	I don't support or oppose this. Seems like it could be fine either way.
Charles	Swanson	This seems to be mixing apples and oranges. CE is education, and pro bono activities are something entirely different—don't try to mix the two. If someone wants to provide some pro bono service that is their individual choice and should not mitigate the CE requirements.
Anastasia	Taber	Sure, this would encourage more supporting of underserved communities.
Jason	Tafoya	Pro Bono work is not CE. Continuing Education is education. Pro Bono work is charitable giving. They are not the same. I appreciate you want to incentivize Pro Bono work, but this is not the right path.
Julie	Takkunen	However I think it should be counted hour for hour and I think more than 10 should be allowed. Someone who has been in the industry a decade or longer should be giving back to the community, not stuck in front of a computer screen reading something they've read 10 times already and could probably write better than the person who wrote it.
John	Talleur	Not appealing to me. Corporate America makes it challenging enough to serve all the clients I already have.
Sima	Tamaddon	Not everyone can do pro bono work
Landon	Tan	Yes giving incentives to do pro-bono will benefit the public.
Christopher	Tarashuk	Supported for the same reasons I support 500 hours of experience.
J Lawrence	Taunt	This needs to be better defined before changed. Pro Bono covers a very wide range of services. i.e. I volunteer 80-90 hours per year to NASAA writing test questions for securities examinations. Does that count? Not that I am advocating that but how do you define it, how do you control it?
David	Taylor	Whether it is pro bono or not, experience is different than education and I am against adding 30% more CE.
Don	Taylor	I don't like that a candidate has to do 30 hours of pro bono work to count as 10 hours of CE. The ratio makes no sense. It comes across as if the Board doesn't value pro bono work and I'm sure that's not its intent.
Josh	Taylor	Don't change to 40 hours.
Travis	Taylor	I don't support the swapping of pro-bono hours for CE hours. I don't see them as related, whatsoever. I would, however, support the inclusion of 10 hours of required pro-bono hours each CE period, or something along those lines.
Travis	Taylor	Seems messy to track. Either raise the CE requirement by 10 hours or don't do it at all. Adding this 'easier way' to get the extra 10 hours of requirement is not constructive.
Victor	Tedesco	No need to increase hours - see previous comments on the survey shown earlier referencing this topic.
Douglas	Tees	I like encouraging pro-bono work, but I don't see how it relates to CE. Also, this would be harder to administer and I would not want to incentivize the wrong behavior (possibly an easier path to misrepresent and one where the optics are particularly bad).

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Phillip	Thanawiwat	I think it's great to be able to influence more Pro Bono service with CFP professionals. Everyone needs financial planning whether they can pay for it or not.
Clint	Thomas	DO NOT increase CE to 40 hours
John	Thomas	1:1 ratio is fine, why penalize service. Please don't increase the total CE requirement.
Gay	Thompson	Pro bono service is not at all the same as CE
Mark	Thompson	now how do we verify 'pro bono'?
Jim	Thorpe	I feel this is a push by the CFP board to get more people into volunteering in pro bono opportunities.
Adam	Thurgood	This isn't CE. This is a backdoor push to get more pro bono work completed.
Charles	Tiblier	No to new ce hours.
Ian	Tollefson	Pro Bono does not = knowledge.
Sarad	Tomlinson	I dont think pro bono work would help maintain knowledge base required to obtain the CFP since CE covers more ground than what would be included in individual pro bono circumstances
Sam	Torrez	I don't think that I need to attend a pro bono education course in order to do pro bono work, however, I do think offering CE for pro bono work is acceptable.
Philip	Tribble	Pro bono work doesn't ensure competency and knowledge. It should not be a substitute for CE if we want CFP Professionals to stay abreast of relevant financial planning topics.
Patrick	Trimp	See previous comments
Cary	Tucker	I applaud the CFP Board for encouraging CFP® professionals to do more pro bono work. Although, from the little bit I've read about lawyers who receive CE credit, the ratio of pro bono hours to CE hours varies by State. The legal authority or Bar for the specific State determines the appropriate pro bono to CE ratio. I just wonder if the CFP Board should set a single, broad bono bono service ratio or if there should be some variations in the ratio.
Nicholas	Tupaj	I oppose this measure based solely on my opposition of raising the number of CE hours needed to 40. However, three hours of pro bono service should not garner 1 hour of CE. The ratio should be more generous at 1:1 or 2:1 as all pro-bono situations are different and may require more or less work within the hour spent.
Rob	Typher	Pro bono experience should be on a 1-to-1 hour for hour basis. Working face to face with the public is often more valuable, and harder, than taking a CE course.
Inderdeep Singh	Uppal	Agree
Darlene	Van Beek	I have questions about supporting this proposal specifically around the appropriate number of hours credited from pro bono service. I believe a data-driven approach would help determine an appropriate and practical number of hours.
Hannah	Varnado	A way to give back, I love that. Up to a max
Dominick	Vetrano	Ridiculous. I am a wealth advisor. There is nothing probono that adds to my practice. On the contrary it increases my liability. Generally speaking this is basic

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		low level low thought planning. 3hour to 1.....it should 10hours of probono to 1.....We are not a government financial counselling service. This degrades the brand.
Andrew	Vidal	Support as this increases financial planning services to low-income and otherwise underserved communities.
Gregory	Virant	Three to one ratio is pretty discouraging, a one-to one ratio would be more beneficial to encourage more pro bono service, it's too much of a time commitment amidst all other obligations to add any of this service time because it will still require a relatively similar amount of CE we already have to complete.
Solon	Vlasto	Sure
David	Voth	Pro bono work is not and should not be a substitute for CE
Kyle	Wagner	Pro bono work is admirable, and CFP professionals can provide immense value to those in need of our expertise. However, pro bono work does not necessarily include understanding complex subject matter, learning about changes in tax law, etc. Pro bono work should be promoted and praised, but should not be a substitute for CE requirements.
Kyle	Walchli	Na
Bryce	Wallace	I think that the ratio could be lowered aswell which would make CFP's more inclined to do Pro bono work.
Christian	Wallace	Maybe make it 2-1
Zach	Wallace	Completely defeats the purpose of Pro Bono work. Pro Bobo translates to 'for the public good' - there should not be any CE hours credited for Pro Bono work. The CE is meant to keep advisors informed and up to date on current topics and changes - Pro Bono, while important, is not CE.
Jennefer	Walsh	I like the idea, but the ratio seems off to me. 2 hours of Pro Bono for 1 hour of CE seems more appropriate.
Kevin	Walsh	If I meet with a prospective client and offer guidance without charging a fee and that person never becomes a paying client of me or my firm does that count as 'Pro-bono?' How about if my I host free educational seminars on topics such as Social Security, Medicare, estate planning or tax law changes? What if we present these rather than hosting them? If so, then I strongly support this proposal. If not, than less enthusiastic about it but still support it.
Lori	Walters	Would be interested to see trial results.
Cody	Ward	Not sure this honors the spirit of 'pro bono'.
Gary	Ward	I strong support the proposal to award CE credit for hours of pro bono volunteer work. I personally volunteer with the ACP and Home for Our Troops and the Tennessee Voluntary Organizations Active in Disaster (TNVOAD) to provide financial educational guidance to service members (ACP and HFOT) and disaster recovery (TNVOAD). On average I provide 6 hours of pro bono service in any given month. Being able to track and count those hours towards the CFP CE requirement would be a blessing and I believe would motivate more pro-bono services. Keeping up with CE credits, compliance training, practice management,

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		client service and professional education and research consumes time. This would be a great benefit to CFPs and the general public.
Victoria	Ward	Agree, but I would not qualify for this program. You see, I live in a small community with many surrounding little towns. My pro bono work is not part of an organized effort with FPA or another organization, but instead by serving people who have are referred to me by other professionals or friends or people who just call looking for help. I recognize they don't have the ability to pay and don't charge them. This is pro bono work but doesn't fit that criteria.
Lukendric	Washington	If you helped educated the community, either by helping individuals of lower income with free planning or providing talks, it should count.
Saviez	Wazir	It's ok I guess.
Rhonada	Weaver	Just keep it as is. Stop creating more work for everyone involved. Life is hard enough.
Coleman	Webb	This makes sense.
James	Webb	Could be abused easily.
Lisa	Webb	The goal is to increase continued competency. I would bet that a pro bono client probably has less resources and complication in their personal financial situation, so how would pro bono service work improve demonstrated competency?
Jeffrey	Weeks	Opposed due to opposition to the 40 hour requirement.
Shannon	Wegner	Pro bono work has nothing to do with CE
Curt	Weil	Not sure why such a ratio makes sense, and giving credit for Pro Bono service is long overdue in any case. Note: as a semi-retired certificant, I limit my practice to Pro Bono work.
Justina	Welch	STRONGLY OPPOSE. DO NOT INCREASE THE CE HOURS.
Mark	Wells	This is great but again how Pro-Bono is determined is my concern.
Katherena	Weyand	Again, as a proponent of pro bono work, I believe that working directly with these clients can provide as robust a continuing education as any course or webinar we may complete online.
Learning	What	Why do you want to cap pro bono work? Judge the activity by its merits not its category. There is a lot of low-quality CE and some pro-bono can be a sham. The way VITA does it with CE on the bottom of f13615 is good because all volunteers have to take a test as well as volunteer https://www.irs.gov/pub/irs-pdf/f13615.pdf If there was something like that on a per activity basis (multiple different pro-bono activities would stack just as any other CE) then sure.
Jack	Wheeler	Most CFPs just take a Kitces report or something similar. I'm not sure this would truly benefit most.
John W	Wheeler Jr	I still question the pro-bono other than for CFPs.
Marian	White	Why are you creating all these rules that do not get to the heart of helping people plan for successful futures, whatever that means to them? This seems like minutia to me, sorry.
Jon	Whited	This is too nebulous and has the potential for an unscrupulous CFP to abuse it when they are short on CE hours.

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Miriam	Whiteley	I do pro bono work. It's great. But it doesn't increase my competence.
Gaius	Whitfield	I am not familiar enough with pro bono offerings to opine on this.
David	Wiedmeyer	Pro Bono work should not count towards CE. Planners are applying their craft during pro Bono work, not improving it.
Tyler	Wiegert	Anything to make the box checking easier if we have to check boxes.
keith	Willerman	Continuing education is different than working pro bono. One should still need to do all required CE regardless of the amount of pro bono work one does.
Charles	Williams	This proposal is duplicated in previous proposals under consideration. The Board should focus on decreasing the quantity of their requirements and focus on the quality of each one.
Ronald	Williams	That would be a good start as well vs asking me how stocks are taxed.
Jonathan	Wilson	I do not support the move to 40 hours of CE, therefore I can not support this proposed change either.
Roger	Wilson	I strongly oppose this Proposed Change due to reasons previously expressed
Alexander	Winstead	It should be given equal standing to other CE if it is to be allowed, making it 1-3 seems like there is a bias against giving back to the community.
Todd	Wnuk	Again, Pro Bono engagements has limited scope and typically deals with very basic financial planning advice.
James	Wood	I do not care if pro bono hours count. I do care if the overall hours are increased in a world where we already have too many requirements.
Christopher	Woodard	I fully support the CFP board promoting the pro bono service hours, but how does one doing pro bono service equate to additional CE hours when others getting paid to do the same work do not receive CE hours. This creates a double standard in my opinion that is not necessary.
Loryn	Woodard	I strongly oppose the 40hr CE requirement but believe this is a good option for the 30 hr requirement too
Tyler	Woodbrey	1:1 pro bono to CE
Leah	Woodly	Pro bono work should not count as continuing education. Oftentimes, pro bono work does not go beyond financial coaching, and most financial planners would not be acquiring significant knowledge through pro bono experience.
Mark	Woodruff	Makes sense, just curious how this will be tracked, and especially measure for quality of pro bono experience.
Laura	Woods	Although I believe 40 hours of CE is excessive (considering I also have much more CE to complete for my other designations), the pro bono hours counting for some of the credit would be good. How would this be determined and tracked? Would it just be self reported as it is currently? I get the impression this is being considered to force CFP professionals to provide pro bono service but shouldn't that really be up to the individual if they are able to provide that service to their community.
Kevin	Worthley	If adopted, ratio should be either 1:1 or 2 hours pro-bono equals one hour CE. 3:1 seems unfair.

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Jim	Wozniak	You are taking a simple easy to understand by all process of 30 CE every 2 years and opening Pandora's Box creating so many different options and sleeves to monitor and keep track of.
Robert	Wright	Pro bono work is not CE, if you think that pro bono work is CE than you would have to admit that your practice is also CE which also doesn't make sense for what CE is trying to accomplish. Doing something for free doesn't all the sudden make it CE.
Laurence	Wulker	It can be incorporated within the framework that I alluded to in the earlier areas of the discussion. Doing it that way, it would be an asset to the public and provide the professional experience to those in the CFP program.
Elissa	Wurf	I like this idea. I received an email the other day about volunteering for the IRS VITA program as a way to get CPE hours. Volunteering in that program led me first to get my EA and CPA and then to later get my CFP, so I would love to volunteer again (if only my work schedule were not so busy right at tax season!)
Michael	Wynn	Not in favor of the 40 hours. Would support some level of pro bono hours being used to meet CE requirements.
Jason	Yockey	CE should be focused on current issues...
Machaka	Young	No further comment
David	Younis	This is essentially saying that you can buy your way out of CE by offering free advice. What if it's bad advice? Should you get credit for doing bad work? No, if you have to do CE, then you have to do CE.
Z	Z	You're really pushing that pro bono here aren't ya
Ian Zabel	Zabel	I am generally not in favor of cutting corners for the sake of altruism
Daria	Zalewska	I think this is a good idea. Pro bono service is important and should be recognized as a valuable service to the public.
Mark	Zeigler	I believe any method to increase and support pro bono work is critically important to support a portion of the population that is underserved. This is one of the largest reasons I'd like to get into financial planning.
Sean		If [pro bono] financial planning is equivalent to CE on a 3 to 1 ratio, then financial planning for clients should also fulfill that same educational purpose and the only CE I should need to complete is the 2-hr Ethics class if I am working with clients full time.
Shara		I don't see pro bono service as continuing EDUCATION. I see that as continuing EXPERIENCE - doing it for free doesn't mean you're learning anything new to your profession.
William		Should be a 1:1 ratio not 3:1. 3:1 really devalues the worth of the pro-bono service.
E	A	Pro bono is FREE or it is NOT PRO BONO. Stop asking for FREE financial planning ... this is SO WRONG! you are telling me that 10 hours are a penalty to me if I don't do PRO BONO so now I will stop my PRO BONO and only do it when I have a benefit ... you are changing the meaning of PRO BONO!!! STOP!!!
		Pro bono service does not necessarily refine a CFP professionals competence but rather adds to the experience gained on a daily basis with not only clients of the

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		firm but the pro bono relationships. I think of continuing education as refining a professionals skills and learning from experts in the industry about a particular topic or strategy. A CFP professional is not getting feedback from a pro bono relationship about whether their advice is correct or if they are mastering a new skill.