From: Allan Moskowitz

To: <u>Linda Cena</u>; <u>NASAA Comments</u>

Subject: [EXTERNAL] IAR CE

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CE requirements for CFP's should be considered to be equal or accepted, since older CFP's were grandfathered in without the requirement of getting a series 65, and the objectives are the same; serving the public. Also, 6 hours of ethics seems extreme to me. The CFP Board only requires 2 hours of Ethics, which seems perfectly adequate. I think it would serve the public better to require all IAR's to become CFP's, which requires much more training. The public is confused enough about who is a "financial planner", "wealth planner/advisor", "financial advisor", etc. There should be more regulation on titles, since anyone can call themselves any of the above without any credentials. Plus, the CFP Board requires the equivalent of 15 hours per year (30 hours every 2 years) and 2 hours must be Ethics. I think that financial reps of B/D's need more supervision, including "hybrid" advisors, as they are still affiliated with broker/dealers. Plus, I think much, much more supervision, regulation and transparency on costs needs to be mandatory for insurance salesman, especially the ones calling themselves to be any of the above titles. That is what is needed to protect the public, not more CE requirements, unless IAR's are not also CFP's.

Allan W. Moskowitz, CFP® AIF® Principal
Certified Financial Planner, licensee, and Accredited Investment Fiduciary

allan@transformativewealthmgt.com

Fee-Only Investment Advisory Services
Transformative Wealth Management, LLC

CA Independent Registered Investment Advisor, IARD# 283660

6317 Fairmount Avenue El Cerrito, CA 94530 510-524-5500

www.transformativewealthmgt.com

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