From: <a href="mailto:chad@ontrackadvisor.com">chad@ontrackadvisor.com</a>
To: <a href="mailto:NASAA Comments; Linda Cena">NASAA Comments; Linda Cena</a>

Subject: [EXTERNAL] Comments - Investment Advisor Representative Continuing Education

**Date:** Monday, February 17, 2020 10:36:47 AM

Attachments: <u>image001.png</u>

Thank you for the opportunity to respond.

I am in support of adding Continuing Education Requirements for IARs. My hope is that, as stated, a goal is minimizing duplicative CE requirements as much as possible.

As a dually registered IAR/Registered Rep, plus having my CFP® designation along with Wisconsin insurance licenses, I am subject to many different forms of CE. The vast majority of continuing education hours do not "cross-over", in other words they are counted for one organization but not for another. I have no problem fulfilling my CE requirements, but I can certainly see areas where the process could be made more efficient. For example, I may have a course meeting the requirements for CFP® continuing education that, while including insurance information, does not meet Wisconsin's insurance CE requirements.

I do see a number of areas where CFP® continuing education would be in the same "area" as IAR CE. Perhaps outreach could be done with CFP Board, as well as FINRA, to streamline this to the extent possible.

Regards, Chad Nehring, CFP®

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Chad Nehring, CFP®
Registered Investment Advisor Representative
2561 E. Calumet St.
Appleton, WI 54915
(920) 731-9500
chad@ontrackadvisor.com
www.ontrackadvisor.com

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