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FPA® Pro Bono Program Guidelines for Participating Members

Purpose

The Financial Planning Association® is dedicated to helping the less fortunate in our communities by providing free, objective financial planning services to eligible individuals and families through its *pro bono* program. These services will be delivered by members through partnerships between their FPA chapter and certain non-profit community-based organizations (CBOs). To ensure consistency of representation, information and procedures for *pro bono* financial planning efforts, FPA is providing the following guidelines for its members who volunteer to serve in a *pro bono* engagement.¹

Pro Bono Volunteers

1. In order to participate in FPA's *pro bono* financial planning program, planners must be FPA members in good standing.
2. A member does not have to be a CFP® certificant in order to provide services, but the *pro bono* letter of engagement must be signed by a CFP certificant who agrees to supervise and take responsibility for services provided in the engagement.
3. Volunteers must abide by the FPA Code of Ethics, requiring them to place their clients' interests first. Further, they should provide to the *pro bono* client the same quality of services as they would a paying client.
4. Volunteers must not sell or promote any products or services while involved in a *pro bono* engagement.
5. Volunteering in FPA's *pro bono* program is available to all FPA members, regardless of designation or lack thereof, subject to the limitations described in Item (2) above and described more fully below.
 - a) Client Services: FPA members who are eligible for FPA's PlannerSearch program are welcome to provide services such as one-on-one counseling and group presentations to clients. Currently only FPA members who are CFP certificants are eligible to participate in PlannerSearch. The lead planner is responsible for the engagement with the *pro bono* client but may delegate tasks to others, including allied professionals, paraplanners and CFP candidates.

¹ These are guidelines only, and not requirements for participation in FPA's national *pro bono* program. As separate 501(c)(6) organizations, FPA chapter affiliates may expand or limit the scope of services or determine eligibility. FPA has developed these guidelines solely for the purpose of setting priorities at the national level, and to provide quality assurance to our national partners in the administration of *pro bono* programs around the country. FPA reserves the right to review and approve in advance the use of any programs and materials containing FPA's logo or trademarks.

- b) Support Services: All FPA members are welcome to provide organizational and administrative support for *pro bono* activities, including developing relationships with partner organizations.
6. Prior to referring a *pro bono* client to an FPA member, the chapter *pro bono* director or his/her designee will contact the *pro bono* planner to determine availability and interest, and verify that the planner is a current FPA member in good standing who meets FPA's requirements for providing *pro bono* financial planning service as outlined in the these guidelines.
7. A database of *pro bono* volunteers and engagements will be maintained by the FPA chapter. When clients are referred to *pro bono* planners, the names of the clients and the planners are entered into the database, which interfaces with FPA's national database. This will be used to track the number and types of referrals and the number of hours worked, to monitor progress, and for FPA to maintain national statistics. Similarly, for group presentations, the name(s) of the financial planner volunteer(s) should be entered into the database along with the group name.
8. All personal information held by volunteers and chapters in connection with *pro bono* programs, including the names of *pro bono* clients, will be maintained consistent with federal and state privacy laws and CFP Board of Standards rules related to confidentiality.

Pro Bono Engagements

9. FPA's *pro bono* program is intended to serve individuals and organizations with the greatest need and who have the least access to financial planning services:
 - a) A *pro bono* client is generally defined as a low-income individual or family household potentially eligible for public benefits. Many partner organizations will screen their clients for public benefits eligibility. In cases where the partner organization does not maintain criteria for determining eligibility FPA encourages the chapter and partner to provide *pro bono* financial planning services to clients with little or no assets and incomes at or below 80% of local median income, the maximum income limit designated by the U.S. Department of Housing and Urban Development for determining eligibility for public housing. HUD income limits for every county and/or metropolitan area can be found on at <http://www.huduser.org/datasets/il.html>. (See FAQ for more information.)
 - b) A *pro bono* partner organization is generally defined as a community-based organization (CBO) with 501(c)(3) status, whose mission and/or the application of whose mission focuses on low income individuals and families as defined above.
 - c) An individual/family client becomes ineligible for additional *pro bono* services when the client achieves a financial status inconsistent with the restrictions set forth in Item 9(a) above and/or graduates from the sponsoring partner organization's program.
10. Each *pro bono* engagement will be clearly defined in terms of types of services and time commitments.
 - a) An individual/family *pro bono* client should receive a "mini-plan" process consisting of three steps:
 - Gathering data and setting goals
 - Data review and clarification
 - Plan presentation including financial statement, assessment of risk, and tax implications.

The mini-plan does not include implementation or monitoring.

Based on the needs of the client, the mini plan may require several meetings or may be completed in one meeting. The scope of services and time required should be agreed upon by the planner, client and the referring partner organization (if any). Notwithstanding any limitation in scope of services, the *pro bono* client should receive the same standard of service as a paying client.

- b) A partner organization and its clients should receive services as determined by agreement between the FPA chapter and the partner.
11. When an FPA chapter forms a partnership with a partner organization, the chapter and partner should sign a written agreement that outlines the scope of the partnership, the services to be provided and the time period. Such a document will help manage the expectations of both sides.
12. A *pro bono* planner should not provide *pro bono* services until both the planner and the client have signed a letter of engagement that outlines the scope of the *pro bono* engagement. FPA provides a sample letter that can serve as an agreement and record of services provided. One copy is retained by the FPA volunteer, one copy is provided to the *pro bono* client, a third copy is provided to the community partner, and a fourth copy is submitted to the local FPA chapter.
13. At the end of each individual engagement, if the *pro bono* client wishes to continue working with the planner to implement the financial plan through a compensation arrangement, full disclosure of compensation method and potential conflicts of interest are required as in a paid financial planning engagement. Such an arrangement is permitted solely at the initiative of the client and not directly, or indirectly, by the planner. Prior to executing such an agreement, the planner is required to provide a copy of the brochure “How a Financial Planner Can Help You ... and How to Choose the Right One” to the client, refer the client to PlannerSearch, and submit the completed and signed Appendix A of the Letter of Engagement to the FPA chapter *pro bono* director or designated chapter member. The planner’s participation in the *pro bono* program in connection with the client is then deemed to be terminated.

FPA Pro Bono Representation

14. *Pro bono* planners are not permitted to distribute business cards or solicit clients for marketing purposes when meeting with *pro bono* financial planning clients. If a client and/or member of a partner organization request a planner’s business card, the planner may provide it. If the *pro bono* client or organization contacts the planner requesting *pro bono* services, such planner is to inform the local FPA chapter *pro bono* director or designated chapter member. Planners and participating chapters are also required to comply with federal and state privacy laws to ensure that client information will be kept confidential, similar to the treatment of regular client information.
15. *Pro bono* planners shall not distribute their firm’s or affiliated firms’ marketing materials or informational materials, unless such information has been approved by FPA. References may not be made to branded products or services for which the planner may directly or indirectly derive an economic benefit.
16. Compliance with the spirit and intent of these guidelines is critical in order to retain the trust of our partner organizations.

FPA Support & Materials

17. From time to time, FPA may make available PowerPoint presentations, worksheets and handouts on various financial planning topics to chapter volunteers, consistent with the eligibility criteria described in Item 9(a). Such presentations are only available to members for use in chapter *pro bono* programs. FPA national and FPA chapter logos should appear in these presentations along with the name and phone number for the local FPA chapter, not of the volunteer. FPA also

provides links to financial literacy materials created by third-party nonprofit resource providers. Some partner organizations may have their own financial education materials.

18. FPA strongly recommends that *pro bono* planners use FPA presentations and related materials when available. Alternatively, planners may use materials created by recognized non-profit and government resource providers when engaged in seminars or consultations. However, *pro bono* planners who prefer to use their own materials must have those reviewed by the member's local FPA chapter to ensure it is applicable and appropriate. All materials must be informational only. Planners may not reference their own companies or other affiliations, as well as specific products, services or recommendations.
19. Given the diverse number of topics that may be addressed in a *pro bono* engagement or seminar, FPA encourages chapters to share educational materials developed at the chapter level with other chapters. FPA can facilitate the sharing of this information by posting it on the FPA website at www.FPAprobono.org. Please request permission from FPA and the respective chapter prior to replacing a chapter's name with your chapter's on any materials.
20. Consumer calls to FPA's National Financial Planning Support Center's toll-free hotline (800.282.7526) requesting *pro bono* financial planning services will be referred to a phone or email contact at participating FPA chapters. Due to resource limitations, the national support center is unable to screen or qualify callers other than the caller's geographic area. It is up to the local FPA chapter to make a final determination if the caller is eligible for *pro bono* financial planning services, in accordance with FPA's *Pro Bono* Program Guidelines.