

Item 1 – Cover Page

Kahala Financial Advisors, LLC

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This Brochure provides information about the qualifications and business practices of Kahala Financial Advisors, LLC.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Kahala Financial Advisors, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Kahala Financial Advisors, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

If you have any questions about the contents of this Brochure, please contact Greg Miyashiro at (808) 734-7665 and/or g.miyashiro@hawaiiantel.net.

Item 2 – Material Changes

This Brochure was prepared in accordance with the U.S. Securities & Exchange Commission's (SEC) requirements and rules.

Kahala Financial Advisors, LLC has no material changes to report.

In the future, this Item will discuss only specific material changes that are made to the Brochure and will provide clients with a summary of such changes.

In the past KFA has offered or delivered information about its qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, KFA will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of its business' fiscal year. KFA may further provide other ongoing disclosure information about material changes as necessary.

KFA will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, KFA's Brochure may be requested by contacting us at 808-734-7665 or g.miyashiro@hawaiiantel.net.

Additional information about Kahala Financial Advisors, LLC is also available via the SEC's web site www.adviserinfo.sec.gov.

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Item 4 – Advisory Business

Kahala Financial Advisors, LLC (KFA) is an independent, fee-only investment advisory firm that offers personalized investment management and financial planning services to Hawaii's households. KFA was established in Hawaii in 1986 as a sole proprietorship and was converted to a limited liability company in 2007. KFA currently serves approximately 160 households.

Here are some reasons why KFA is unique:

- We are qualified by education and experience.
- We are an independent advisory firm with no outside influences to compromise our objectivity.
- We are "fee-only" meaning no commission sales to compromise our integrity.
- Our advisory fees are competitively priced.
- We manage well-diversified portfolios of cost-efficient mutual funds.
- We are qualified to use the exclusive Dimensional Advisor Funds family of mutual funds.
- Our discretionary trading authority results in efficient, hassle-free investing for our clients.
- Our graphic portfolio performance reports are easy to understand.
- We offer value-added personal financial planning advice.
- We are a locally owned family business with an internal succession plan.

Investment Management Service. KFA offers investment analyses, asset allocation, quarterly performance reports, on-going monitoring and rebalancing services for its clients' portfolios. KFA provides a set of asset allocation models ranging from conservative to aggressive. Clients may choose one or more models depending on the purpose and time horizon of each account. KFA applies a long-term "buy and hold" approach and will diversify your account(s) among various stocks and bonds using low-cost mutual funds. KFA does not attempt to time the markets. KFA's clients' accounts remain fully invested and subject to rebalancing as needed. KFA requires discretionary trading authority from all its clients. KFA devotes most of its time to this core service of the firm. KFA's fee schedule is provided in the following section.

The relationship between you and KFA may be terminated at any time by either party. However, such termination must be in writing. You will be charged for any time expended on your behalf. You will have five business days to terminate the agreement without penalty.

Personal Financial Planning Service. Personal financial planning is the analysis of your financial situation with recommendations which may pertain to the proper use of credit, budgets, insurance, income tax-reduction strategies, retirement and college-funding analyses, wills and trusts, and the various forms of investments. KFA does not however, provide legal advice. KFA's personal financial planning service is incidental to its investment management service and is available to its investor clients at no additional cost.

Item 5 – Fees and Compensation

Investment Advisory Fees. Kahala Financial Advisors, LLC's (KFA) fee for providing investment supervisory services is based on each household's aggregate amount of assets being managed. The total fee shall then be pro-rated and deducted from each account according to the following schedule.

1.0 percent per year (0.25 percent per quarter) for the first \$500,000

0.75 percent per year (0.1875 percent per quarter) for the next \$500,000

0.50 percent per year (0.1250 percent per quarter) for amounts over \$1 million

These fees are payable to KFA in advance at the start of each calendar quarter. The investment advisory fee for the first quarter shall be based on the market value on the date the client services agreement is signed and shall be prorated for the balance of the calendar quarter. The service fees for subsequent quarters shall be based on the market value of the assets under management as of the end of the preceding calendar quarter. Authorization for the automatic deduction of fees from each account is contained in the custodian's brokerage account application. KFA's fees are not negotiable; however, KFA reserves the right to discount or waive its fees at its own discretion. KFA's investment advisory fees are exclusive of any brokerage commissions, transaction fees, mutual fund fees and other related costs and expenses which may be incurred by the client.

Applicable Taxes. Any applicable state and local taxes shall be applied to KFA's fees. The State of Hawaii imposes a general excise on local businesses which in turn may pass the tax on to their customers. The current combined maximum rate you may be charged is 4.712 percent.

Automatic Deduction of Fees. Authorization for the automatic deduction of fees from each account is contained in the custodian's brokerage account application.

Invoices. The computation of fees will be reflected in the invoices that are included with the quarterly performance reports. You are encouraged to review each invoice for accuracy by comparing your invoices with the statements received from the custodian.

Fee Adjustment for Substantial Withdrawals. Fee adjustments will be considered for significant withdrawals made during the quarter that are independent of any systematic withdrawal scheme. Such an adjustment will be made if it amounts to a refund of 10 percent or more of the current quarterly fee. Fees will be credited back to on-going account. Refund checks will be mailed to clients with closed accounts. A fee adjustment will not be made for transfers of cash or other assets between any client's related accounts.

Early Termination. The client service agreement may be terminated without penalty upon delivery of written notice to KFA within five business days after the date you had signed the client services agreement. After this initial five-day period has elapsed, either party may terminate the contract upon 30 days written notice. Upon termination of an account, a refund of service fees will be prorated on the number of days remaining during the quarter after the date of withdrawal.

Other Advisory Fees. In addition to KFA's management fee, certain investment vehicles such as a mutual fund also assess management fees that are built into the daily pricing of the shares of each fund.

KFA's mutual fund selection criteria include mutual funds with below-average expense ratios. The fees charged by each mutual fund shall be disclosed in its prospectus and periodic reports to its investors. During review meetings or upon request, KFA may produce third-party research reports that disclose the fees of each mutual fund and portfolio.

Custodial Fees. Since 1995, Kahala Financial Advisors, LLC has exclusively recommended Charles Schwab & Company (Schwab) as the custodian and broker for its clients' accounts. Since the fall of 2017, Schwab had reduced KFA's transaction fees to a flat \$15 per trade whenever we buy or sell shares of a no-load mutual fund for each client. Schwab may earn a portion of the management fees that are paid by certain mutual funds that elect to participate in Schwab's "No Transaction Fee" marketplace. Schwab also earns management fees on its money market mutual funds that are available for the cash positions in each account. The management fees for Schwab's proprietary mutual funds are disclosed in their mutual funds' prospectuses and periodic reports. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program (Schwab Bank).

Schwab may charge other fees such as wire transfer fees, margin account interest and non-standard asset holding fees. Generally, these fees are not applicable to most of the accounts under our management. Clients may opt for such services and fees under any self-directed account (not managed by KFA) they may have at Schwab.

Important Income Tax Note. Under the previous tax law, investment advisory fees that were paid from taxable brokerage accounts may have been deducted by those who "itemize" their tax deductions. Since 2018, this deduction has been suspended until 2025.

Item 6 – Performance-Based Fees and Side-By-Side Management

Kahala Financial Advisors, LLC does not participate in nor charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Kahala Financial Advisors, LLC (KFA) offers portfolio management services primarily to individuals, trusts and estates. The types of accounts generally include but are not limited to taxable brokerage accounts (individual, joint, trust and custodial) and retirement accounts (IRAs, SEP-IRAs, Keogh, 403B, Roth IRAs, and Education IRAs). KFA's services are also available to charitable organizations and corporations.

For prospective clients, KFA's suggested minimum investable asset level per household is \$500,000. This minimum shall not apply to existing client accounts of record.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

The types of investments Kahala Financial Advisors, LLC may offer advice on include: equity securities (stocks) such as exchange-listed securities and securities traded over the counter; corporate debt securities (bonds); certificates of deposit; municipal securities (bonds); investment company securities such as mutual fund shares, variable life insurance and variable annuities; U.S. government securities (bonds); and interest in partnerships that invest in real estate, oil & gas, business venture, research and development, equipment leasing and cable television. Investment advice may also pertain to the use of real estate and other tangible forms of investment.

KFA's main sources of information come from but is not limited to research materials prepared by others, corporate rating services, financial newspapers and magazines, annual reports, prospectuses, filings with the Securities & Exchange Commission and company press releases. KFA utilizes both fundamental and technical forms of analyses.

KFA offers portfolios consisting of low-cost, no-load (no sales commissions) open-end mutual funds. Each client may have one or more investment portfolios. Each portfolio may be assigned to an asset allocation model ranging from relatively low risk to high risk depending on the investor's investment objectives, risk tolerance and time horizon. Each model will include equity (stocks) mutual funds that represent different segments of the market such as large domestic companies, small domestic companies and foreign-owned companies. The portion of each portfolio that is allocated to debt securities (bonds) includes cash equivalents, high-quality U.S. government securities and corporate bonds. Clients are free to adjust their models at any time to suit any changes in their lifestyles and preferences. For example, a client that is approaching retirement may switch from an aggressive model to a more moderate model.

KFA makes no attempt to "time" the markets. Instead, KFA applies a long-term "buy and hold" approach to investing. This means that you should expect to remain fully invested in mutual funds that KFA had selected for the long haul but rebalance when necessary. This style of investing requires a high degree of patience and commitment from you, particularly during recessions (economic downturns) and the depressed financial markets which may easily last two or more years. KFA believes its clients' accounts results are well-diversified (risk spread among various industries and companies) to minimize company-specific risks (i.e. a company going bankrupt where its stock becomes worthless). However, KFA cannot eliminate markets risks where account values may decline in value due to market conditions. KFA does not simply ride out the ups and downs of the markets. Instead, KFA employs a contrarian approach to rebalancing its clients' accounts. For example, during good times, KFA may sell a portion of the riskier equity securities (stock funds) to purchase the safer debt securities (bond funds). Conversely, during bad times, KFA may sell a portion of the debt securities to purchase equities securities. KFA's clients' accounts are monitored regularly and reviewed at least once a month for rebalancing opportunities.

KFA offers no performance guarantees. Investing in securities involves risk of loss that you should be prepared to bear. KFA does not seek quick, short-term profits. Instead, KFA invests its clients' monies for the long-term. You should not invest any monies with KFA unless you are prepared to commit to the program for at least five to ten years.

Use of Exclusive Mutual Funds: The mutual funds managed by Dimensional Fund Advisors (DFA) are generally only available through approved registered investment advisers including KFA. KFA utilizes DFA mutual funds. Thus, if a client were to terminate KFA's services, restrictions regarding transferability and/or additional purchases of, or reallocation among, DFA funds will apply.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the firm or the integrity of its management.

Kahala Financial Advisors, LLC and its principals have no history of any legal or disciplinary actions and has no knowledge of any pending issues.

Compliance Audit History:

The State of Hawaii DCCA Securities Division had inspected KFA's books and records in 2013.

The U.S. Securities & Exchange Commission (SEC) had conducted routine compliance inspections of KFA in 1997 and 2008.

Item 10 – Other Financial Industry Activities and Affiliations

Kahala Financial Advisors, LLC is an independent investment advisory firm. KFA and its principals are not affiliated with any other firm.

Item 11 – Code of Ethics

Kahala Financials Advisors, LLC values the confidence and trust of its clients. KFA has an in-house code of ethics (code) to which it adheres. The purpose of the code is to avoid any conflicts of interest between KFA and its clients and to protect KFA's clients by deterring misconduct, educate KFA's employees regarding KFA's expectations and the laws governing their conduct, remind employees that they are in a position of trust and must act with complete propriety at all times, protect the reputation of KFA, guard against violations of the securities laws, and establish procedures for employees to follow to ensure that they are complying with KFA's ethical principles.

Key Components:

Personal securities transactions. KFA's code states that its access person's non-exempt accounts shall be subject to periodic review to prevent the misuse of non-public information. KFA's access persons are prohibited from participating in Initial Public Offerings and Private Placements.

Insider trading. KFA's code specifies that access persons are prohibited from trading while in the possession of material non-public information. Also, access persons are prohibited from communicating non-public information to others.

Gifts and entertainment. To avoid the possibility of any conflicts of interest between KFA and its clients, KFA's code prohibits members of KFA from engaging in the exchange of cash, gifts, or entertainment (that exceed the de minimis amount of \$100) between KFA and any other person or entity that may compromise its fiduciary role.

A copy of KFA's code of ethics shall be made available upon request.

Item 12 – Brokerage Practices

The Custodian and Broker We Use. Kahala Financial Advisors, LLC does not maintain custody of your assets that KFA manages; although KFA may be deemed to have custody of your assets if you give KFA authority to withdraw assets from your account (see *Item 15 – Custody*, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. KFA requires that its clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian.

KFA is independently owned and operated and is not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when KFA instructs them to. While KFA requires that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. KFA does not open the account for you, although KFA may assist you in doing so. If you do not wish to place your assets with Schwab, then we cannot manage your account.

How We Select Brokers/Custodians. KFA seeks to use a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. KFA considers a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to KFA and its other clients
- Availability of other products and services that benefit us, as discussed below (see “*Products and Services Available to Us from Schwab*”)

Your Brokerage and Custody Costs - For KFA's clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. KFA has

determined that having Schwab execute most trades is consistent with KFA's duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see *"How We Select Brokers/Custodians"*).

Products and Services Available to Us from Schwab - Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like KFA. They provide KFA and its clients with access to its institutional brokerage— trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help KFA manage or administer its clients' accounts; while others help to manage and grow its business. Schwab's support services generally are available on an unsolicited basis (KFA does not have to request them) and at no charge to KFA.

Services That Benefit You - Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which KFA might not otherwise have access or that would require a significantly higher minimum initial investment by KFA's clients. Schwab's services described in this paragraph generally benefit you and your account.

Services That May Not Directly Benefit You - Schwab also makes available to KFA other products and services that benefit KFA but may not directly benefit you or your account. These products and services assist KFA in managing and administering KFA's clients' accounts. They include investment research, both Schwab's own and that of third parties. KFA may use this research to service all or a substantial number of its clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of KFA fees from KFA's clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us - Schwab also offers other services intended to help us manage and further develop KFA's business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to KFA. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide KFA with other benefits, such as occasional business entertainment of KFA's personnel.

KFA's Interest in Schwab's Services - The availability of these services from Schwab benefits KFA because KFA does not have to produce or purchase them. KFA does not have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. We may have an incentive to require that you maintain your account with Schwab, based on KFA's interest in receiving Schwab's services that benefit KFA's business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. KFA believes,

however, that KFA's selection of Schwab as custodian and broker is in the best interests of KFA's clients. KFA's selection is primarily supported by the scope, quality, and price of Schwab's services (see "*How We Select Brokers/Custodians*") and not Schwab's services that benefit only KFA.

KFA has taken full advantage of Schwab's services that KFA believes has benefited its clients directly and indirectly. KFA expects to utilize Schwab's services in the future for the same reasons.

Item 13 – Review of Accounts

Kahala Financial Advisors, LLC (KFA) encourages each client to participate in periodic reviews of their investment portfolios. The frequency of these reviews will be at the discretion of each client. At minimum, an annual review meeting during each primary client's birth month is suggested.

Ryan Miyashiro and/or Greg Miyashiro shall review each account at least monthly. Portfolios are periodically rebalanced to their prescribed asset weightings. The performances of the individual securities are also reviewed on a regular basis.

The investment portfolio performance reports are prepared on a quarterly basis for all clients. These reports are prepared by Ryan and/or Greg Miyashiro. These reports include, but are not limited to:

- Portfolio Performance Review Report - an executive summary of how each account is performing over various time periods relative to its assigned market benchmark.
- Investment Advisory Fee Statement – our invoice shows how each household's accounts' values are bundled together to calculate the lowest management fees under various breakpoints.

Item 14 – Client Referrals and Other Compensation

KFA receives an economic benefit from Schwab in the form of the support products and services it makes available to KFA and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit KFA, and the related conflicts of interest are described above (see *Item 12 – Brokerage Practices*). The availability of Schwab's products and services to KFA is not conditioned on KFA's investment advice, such as buying certain securities for its clients. In other words, Schwab does not influence our investment decisions.

Other than a basic informational website, KFA does not advertise. A large portion of KFA's clients have come from word-of-mouth referrals from existing clients and other professionals. KFA does not pay for referrals and does not offer incentives of any kind for referrals.

At Schwab's discretion, KFA may be listed on its directory of independent advisors. However, KFA does not have any unique arrangements with Schwab and is not a participant in Schwab's referral program.

Item 15 – Custody

Clients should receive monthly statements from Charles Schwab & Company, a qualified custodian that holds and maintains KFA's clients' investment assets. KFA urges you to carefully review such

statements and compare such official custodial records to the account statements that KFA may provide to you. KFA's statements may vary slightly from custodial statements based on different accounting procedures. Schwab uses the "cash method" of accounting while KFA uses the "accrual method" for consistent performance measurement purposes. The daily valuations of securities are provided by Schwab.

Under government regulations, KFA is deemed to have custody of your assets if, for example, you authorize KFAs to instruct Schwab to deduct KFA's advisory fees directly from your account. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. KFA also urges you to compare Schwab's account statements to the quarterly portfolio reports you will receive from KFA.

Item 16 – Investment Discretion

Kahala Financial Advisors, LLC (KFA) requires discretionary trading authority from each client at the outset of an advisory relationship to select the identity, the amount and the timing of securities to be bought or sold.

KFA believes that discretionary trading enables KFA to trade efficiently and in a timely manner whereas non-discretionary trading may be slow, cumbersome and inefficient.

In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for each client account.

When selecting securities and determining amounts, KFA observes the investment policies, limitations and restrictions of the clients for which it advises.

All clients are required to provide KFA with discretionary authority on their Schwab account applications. This is known as a Limited Power of Attorney where KFA is granted the power to trade securities, deduct management fees when invoiced and request disbursements of cash to clients.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, KFA does not have any authority to and does not vote proxies on behalf of advisory clients. Clients are responsible for receiving and voting proxies for all securities maintained in their portfolios.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about its financial condition. KFA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Item 19 – Part 2B Brochure Supplement

KFA's principal advisors and owners:

Ryan Miyashiro, born 1978 in Honolulu, Hawaii, is a graduate of the University of Hawaii at Manoa (BBA Finance). Ryan had earned the right to use the Certified Financial Planner™ mark in 2007 and maintains an active license (#130451). Ryan has been a member of the Financial Planning Association since 2007.

Ryan is a partner and chief investment officer of KFA. Ryan had started with KFA in 2004 where he has managed client portfolios since then. His duties include asset allocation modeling, mutual fund selection, portfolio monitoring and rebalancing, accounting and performance reporting and other related duties. Ryan works directly KFA's clients with their financial planning and investment needs.

Greg Miyashiro, born 1952 in Honolulu, Hawaii, is a graduate of the University of Hawaii at Manoa (BBA Finance). Greg had earned the right to use the Certified Financial Planner™ mark (see CFP below) in 1983 and continues to maintain his license (#6276). Greg has been a member of the Financial Planning Association since 1981.

Greg is a partner, manager and chief compliance officer of KFA. Greg Miyashiro has over 43 years of experience in personal financial planning that includes taxes, investments, retirement, insurance, budgeting and estate planning. Greg also works directly with KFA's clients for their financial planning and investment needs.

About the “CFP - Certified Financial Planner” license

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA (Certified Public Accountant)
- ChFC (Chartered Financial Consultant)
- CLU (Chartered Life Underwriter)
- CFA (Chartered Financial Analyst)
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years