CFP BOARD OF STANDARDS

CFP BOARD

COMPARING **CFP Board's *Code of Ethics and Standards of Conduct*** TO **The NAIC's Suitability in Annuity Transactions Model Regulation #275**

INTRODUCTION

CFP Board is providing this guidance to those CFP® professionals who are subject to the National Association of Insurance Commissioners (NAIC) **Suitability in Annuity Transactions Model Regulation** (MO-275-1) (as revised, the Model Regulation), to help them understand CFP Board's perspective on some important similarities and differences between CFP Board's ***Code of Ethics and Standards of Conduct*** (*Code and Standards*) and the Model Regulation. This guide does not provide a comprehensive summary of all similarities and differences. Differences between CFP Board's *Code and Standards* and the Model Regulation may become clearer if the NAIC develops additional guidance or states interpret or enforce regulations implementing the Model Regulation.

A CFP® professional who is an agent or broker licensed to sell annuity products will be subject to both the *Code and Standards* and the Model Regulation (to the extent the CFP® professional practices in a state that has adopted the Model Regulation).

A CFP® professional will be subject to other state insurance or securities laws, rules, and regulations. This guide compares the *Code and Standards* to the Model Regulation and does not provide a holistic review of all laws, rules, and regulations that might apply to a CFP® professional.

CFP Board's ***Code and Standards*** reflects the commitment that all CFP® professionals make to high standards of competency and ethics. CFP Board's *Code and Standards* benefits and protects the public, provides standards for delivering financial planning, and advances financial planning as a distinct and valuable profession. Compliance with the *Code and Standards* is a requirement of CFP® certification that is critical to the integrity of the CFP Board certification marks. Violations of the *Code and Standards* may subject a CFP® professional to discipline.

The NAIC provides expertise, data, and analysis for insurance commissioners to regulate the insurance industry and protect consumers, and is governed by the chief insurance regulators from the 50 states, the District of Columbia, and five U.S. territories to coordinate regulation of multistate insurers. The NAIC promulgates model laws and regulations for many insurance products. A model law or regulation has no legal effect until it is adopted by a state. In February 2020, the NAIC approved revisions to its Model Regulation. Most states **have adopted** the Model Regulation, with proposals pending in several remaining states.

KEY TAKEAWAYS

The Scope of the *Code and Standards* is broader than the Model Regulation.

The *Code and Standards* applies more broadly than the Model Regulation. The Model Regulation applies only to annuities, not other types of insurance, and excludes annuities in many workplace retirement plans. The *Code and Standards* applies to all Financial Advice.

The *Code and Standards* Imposes a Fiduciary Duty. The Model Regulation Does Not.

The *Code and Standards* applies a fiduciary duty. The Model Regulation states that a "best interest" standard applies, but then explicitly provides that the "best interest" standard is not a fiduciary duty.

The *Code and Standards* Applies a Prudent Professional Standard. The Model Regulation Does Not.

By stating that "[p]roducers shall be held to standards applicable to producers with similar authority and licensure," the Model Regulation care obligation appears to be lower than the *Code and Standards'* Duty of Care requirement and prudent professional standard. The Model Regulation allows a producer to recommend products that other insurance professionals would determine effectively address a consumer's financial situation, insurance needs and financial objectives, even if a prudent professional would not recommend the product.

The *Code and Standards* (as set forth in guidance) Restricts the Circumstances in Which a CFP® Professional May Recommend a Product from a Limited Menu of Options. The Model Regulation Does Not.

The Model Regulation allows a producer to recommend an annuity from a limited menu of products, without consideration of what is generally available in the marketplace. If a CFP® professional determined that none of the available products from the limited menu would be in the Client's best interests, then the CFP® professional would not be able to recommend a product from the limited menu.

The *Code and Standards* Treats Compensation as a Material Conflict of Interest. The Model Regulation Does Not.

The Model Regulation excludes cash and non-cash compensation from the scope of material conflicts of interest. As a result, while the Model Regulation requires disclosure of how the producer is compensated, there is no requirement in the Model Regulation to identify and reasonably manage compensation-related conflicts. CFP Board considers conflicts related to cash and non-cash compensation to be among the most prevalent and significant conflicts of interest. A CFP® professional must disclose and properly manage their compensation-related Material Conflicts of Interest.

THE SCOPE OF THE *CODE AND STANDARDS* IS BROADER THAN THE MODEL REGULATION.

Both the *Code and Standards* and the Model Regulation apply to recommendations concerning annuity transactions. However, the *Code and Standards* applies to Financial Advice regarding a broader range of **Financial Assets**, including life insurance and other insurance products. The Model Regulation does not apply to life insurance or other insurance products.

What advice does it cover?

TYPE OF FINANCIAL ADVICE	CFP BOARD	MODEL REGULATION
Recommendation to purchase an annuity	✓	✓
Recommendation to replace or exchange an annuity	✓	✓
Financial Advice about an in-force annuity (unrelated to a replacement or exchange)	✓	
Financial Advice about insurance products other than annuities	✓	
Financial Advice to Workplace Retirement plans (see box below)	✓	
Financial Advice generally	✓	

The *Code and Standards* applies the Fiduciary Duty to all **Financial Advice**, including a recommendation that a Client take or refrain from taking a particular course of action with respect to the development or implementation of a financial plan. The Model Regulation's component obligations apply only when a producer makes a recommendation of an annuity.

The Model Regulation defines a recommendation to include advice that was intended to result or does result in a purchase, an exchange, or a replacement of an annuity. Therefore, because the Model Regulation does not apply to advice concerning in-force annuity contracts (other than in the context of recommending an exchange or a replacement annuity), the Model Regulation might not apply to financial advice relating to, for example, reallocation of premiums within an existing contract or a decision to exercise a contractual right under the contract. In contrast, CFP Board's Fiduciary Duty applies to all Financial Advice, including Financial Advice regarding in-force annuity contracts.

Application to Workplace Retirement plans

The Model Regulation does not apply to transactions involving contracts used to fund a number of workplace retirement plans, listed below. The *Code and Standards* does not have this limitation. For example, the Model Regulation does not apply to a CFP® professional's recommendation that a Client purchase a fixed annuity with funds in an excepted workplace retirement plan. However, the *Code and Standards* does apply in this circumstance.

Workplace Retirement plans outside the scope of the Model Regulation

1. An employee pension or welfare benefit plan that is covered by ERISA;
2. Retirement plans covered under the Internal Revenue Code that are established and maintained by an employer, including qualified pensions, profit-sharing, and stock bonus plans, 401(k)s, 403(b)s, SEP IRAs, and SIMPLE IRAs;
3. A government or church plan defined in IRC Section 414, a government or church welfare benefit plan, or a deferred compensation plan of a state or local government or tax-exempt organization under IRC Section 457; or
4. A nonqualified deferred compensation arrangement established or maintained by an employer or plan sponsor.

THE *CODE AND STANDARDS* IMPOSES A FIDUCIARY DUTY. THE MODEL REGULATION DOES NOT.

The *Code and Standards* explicitly imposes a Fiduciary Duty.

The *Code and Standards* provides that a CFP® professional must act as a fiduciary, and therefore, act in the best interests of the Client, at all times when providing Financial Advice. The following duties must be fulfilled:

- Duty of Loyalty;
- Duty of Care; and
- Duty to Follow Client Instructions.

The Model Regulation explicitly does not impose a Fiduciary Duty.

The Model Regulation is not a fiduciary standard. Model Regulation FAQ 1.

The Model Regulation provides that a producer, when making a recommendation of an annuity, shall act in the best interest of the consumer under the circumstances known at the time the recommendation is made, without placing the producer's or the insurer's financial interest ahead of the consumer's interest. The Model Regulation then provides that the producer "has acted" in the best interest of the consumer if they have "satisfied" four component obligations:

- Care;
- Disclosure;
- Conflict of interest (excluding compensation); and
- Documentation.

The NAIC's determination that the Model Regulation does not create a fiduciary obligation suggests that a producer who satisfies the component obligations of the Model Regulation's "best interest obligations" might not satisfy CFP Board's Fiduciary Duty.

Separately, the Model Regulation requires the insurer to establish and maintain a supervision system that is reasonably designed to achieve the insurer's and its producers' compliance with the Model Regulation. This requirement goes beyond the scope of CFP® certification. CFP Board certifies individuals, not firms, and thus CFP Board does not have requirements that apply to an insurer.

There are Additional Differences Between the *Code and Standards'* Fiduciary Duty and the Model Regulation "Best Interest" Obligation.

- The *Code and Standards* explicitly requires the Client's interests to come first. The Model Regulation does not.
- The *Code and Standards* requires a CFP® professional to act without regard to the financial or other interests of the CFP® professional, the CFP® Professional's Firm, or any individual or entity other than the Client. The Model Regulation does not use similar language.
- While the Model Regulation states that a producer shall not place the producer's or the insurer's financial interest ahead of the consumer's interest, none of the component obligations include a specific requirement for the producer to act in the best interests of the consumer.

THE *CODE AND STANDARDS'* DUTY OF CARE IS HIGHER THAN THE MODEL REGULATION'S CARE OBLIGATION.

While the *Code and Standards* and the Model Regulation similarly include client-specific duties of care, there are significant differences. CFP Board's Duty of Care requires "care, skill, prudence, and diligence" while the Model Regulation requires a producer to have "reasonable diligence, care and skill." Thus, the Model Regulation does not require "prudence." In CFP Board's view, "prudence" indicates a fiduciary obligation, and CFP Board has provided guidance on how to meet this requirement through a prudent process. **Duty of Care Guide**.

In addition, the Model Regulation requires the producer to "have a reasonable basis to believe the recommended option effectively addresses the consumer's financial situation, insurance needs and financial objectives." Under the *Code and Standards*, however, the Duty of Care requires a CFP® professional to consider which options (a) effectively address the Client's needs, (b) are in the Client's best interests, and (c) may be prudently recommended to the Client. **Duty of Care Guide**.

The Model Regulation explicitly states that the care obligation does not create a fiduciary obligation, while the *Code and Standards* states that the Duty of Care must be fulfilled to satisfy the Fiduciary Duty.

By stating that "[p]roducers shall be held to standards applicable to producers with similar authority and licensure," the Model Regulation care obligation appears to be lower than the Duty of Care requirement in the *Code and Standards*, which measures a CFP® professional against a "prudent professional" standard. A licensed insurance agent in a compliance or enforcement action under the Model Regulation would be compared only to other licensed insurance agents "as opposed to being compared to investment advisers or possibly higher-level fiduciaries…" Model Regulation FAQ 7. As a result, the Model Regulation would allow a producer to recommend products that other insurance professionals would determine effectively address a consumer's financial situation, insurance needs and financial objectives, even if a prudent professional would determine that those products are not in the best interests of the consumer.

CFP Board's Duty of Care, on the other hand, requires a CFP® professional to act with the care, skill, prudence, and diligence that a prudent professional would exercise without limiting the standard to the conduct of those professionals with similar authority or licensure. A CFP® professional must review the possible courses of action that a prudent professional would evaluate under the facts and circumstances at the time of the recommendation. **Duty of Care Guide**.

CODE AND STANDARDS

The Duty of Care in the *Code and Standards* requires a CFP® professional to "act with the care, skill, prudence, and diligence that a prudent professional would exercise in light of the Client's goals, risk tolerance, objectives, and financial and personal circumstances."

MODEL REGULATION

The care obligation requires, among other things, that a producer shall exercise reasonable diligence, care and skill to:

i. Know the consumer's financial situation, insurance needs and financial objectives;
ii. Understand the available recommendation options after making a reasonable inquiry into options available to the producer;
iii. Have a reasonable basis to believe the recommended option effectively addresses the consumer's financial situation, insurance needs and financial objectives over the life of the product, as evaluated in light of the consumer profile information; and
iv. Communicate the basis or bases of the recommendation.

Limited Product Menus

The Model Regulation allows a producer to recommend an annuity from a limited menu of products without considering what is generally available in the marketplace, but the *Code and Standards* does not allow a CFP® professional to do so.

The Model Regulation states that a producer does not need to analyze or consider products outside of the authority and license of the producer or other possible alternatives available in the marketplace.

A CFP® professional cannot use the CFP® Professional's Firm's limited product menu to justify recommending a course of action that is not in the Client's best interests. CFP Board has stated in **case study** guidance that a CFP® professional's ability to offer only from a limited menu is not, by itself, a breach of the Fiduciary Duty. If a CFP® professional determined, however, that none of the available products from the limited menu would be in the Client's best interests, then the CFP® professional would not be able to recommend a product from the limited menu. When performing this analysis, a CFP® professional does not have to be familiar with every possible product in the marketplace, but the CFP® professional is expected to be aware of the range of financial products and services generally available in the marketplace. **Duty of Care Guide.**

The Model Regulation and the *Code and Standards* Apply Different Standards When the Professional is Able to Obtain Limited Information from the Client.

Under the Model Regulation, a producer may recommend and sell an annuity even if the consumer refuses to provide profile information, as long as the consumer signs a statement acknowledging the refusal. Model Regulation Appendix B. In contrast, under the *Code and Standards*, if a CFP® professional is unable to obtain information necessary to fulfill the Scope of Engagement, then the CFP® professional may not be able to provide Financial Advice in the best interests of the Client. In that case, the CFP® professional may need to limit the Scope of Engagement or terminate the Engagement. The CFP® professional must inform the Client of any such limitations. **Duty of Care Guide.**

Monitoring Obligations are Similar Under the *Code and Standards* and the Model Regulation.

The *Code and Standards* and Model Regulation have similar requirements regarding monitoring obligations. The Model Regulation states that the requirements under the care obligation do not mean that the producer has ongoing monitoring obligations, although a monitoring obligation may be separately owed under the terms of an agreement between the consumer and the producer. Similarly, the *Code and Standards* generally does not encompass a duty to monitor Financial Advice. Whether the CFP® professional is required to monitor the Financial Advice and update recommendations will depend on the Scope of Engagement and the legal standards that apply to the Financial Advice. CFP Board has provided guidance for a CFP® professional who does have such a duty in the **Duty of Care Guide**.

THE *CODE AND STANDARDS* TREATS COMPENSATION AS A MATERIAL CONFLICT OF INTEREST. THE MODEL REGULATION DOES NOT.

While the *Code and Standards* and the Model Regulation both include obligations to address conflicts of interest, they are different in scope and application.

The NAIC determined that cash and non-cash compensation is not a material conflict of interest. By contrast, CFP Board considers conflicts related to cash and non-cash compensation to be among the most prevalent and significant conflicts of interest. A CFP® professional must disclose and properly manage compensation-related Material Conflicts of Interest.

CFP Board considers Material Conflicts of Interest related to cash and non-cash compensation to be prevalent and significant.

A CFP® professional must manage Material Conflicts of Interest related to compensation to ensure that these Material Conflicts do not compromise the CFP® professional's ability to act in the Client's best interests. CFP Board has published a **Guide to Managing Conflicts** to assist a CFP® professional in this process.

CFP Board has provided the following examples of Material Conflicts of Interest under the *Code and Standards* that must be managed and disclosed:

- Differential compensation for the recommendation of different products;
- Recommendation to roll over assets from a 401(k) to an IRA, resulting in compensation to the professional (*e.g.*, a commission or fee for assets under management);
- Cash and non-cash incentives provided by the firm; and
- Revenue sharing agreements of the CFP® Professional's Firm.

Avoidance or Elimination

CFP Board has provided examples of Material Conflicts of Interest so great they must be avoided, specifically non-cash compensation such as sales contests, trips, prizes, and other similar bonuses based on sales of certain securities or accumulation of assets under management.

The NAIC determined that cash and non-cash compensation are not material conflicts of interest.

Material conflicts arising from cash and non-cash compensation do not need to identified and be managed.

The NAIC has provided the following examples of material conflicts of interest under the Model Regulation that must be managed and disclosed:

- Producer has an ownership interest in the insurance company;
- Producer has borrowed money from the insurance company; and
- Producer's spouse, partner or relative is an executive in the insurance company. Model Regulation FAQ 11.

Avoidance or Elimination

The Model Regulation requires insurers to establish and maintain reasonable procedures to identify and eliminate sales contests, sales quotas, bonuses, and non-cash compensation that are based on the sales of specific annuities within a limited period of time.

IS COMPENSATION A MATERIAL CONFLICT OF INTEREST?

CFP BOARD: YES

CFP Board has stated that both cash and non-cash compensation are some of the most common Conflicts of Interest. **Guide to Managing Conflicts**

NAIC: NO

The NAIC has stated, "in light of these robust disclosures [required about cash and non-cash compensation], and the fact most consumers recognize producers will be compensated for their work, the NAIC determined that compensation is not a material conflict of interest." Model Regulation FAQ 10.

Why this difference matters: Although the Model Regulation requires disclosure of how the producer is compensated and has a provision that prohibits placing the producer's or insurer's financial interests ahead of the consumer's interest, there is no requirement in the Model Regulation to identify and reasonably manage compensation-related conflicts of interest.

A CFP® professional must both disclose these conflicts and adopt and follow business practices reasonably designed to prevent Material Conflicts of Interest from compromising the CFP® professional's ability to act in the Client's best interests.

The SEC has likewise identified cash and non-cash compensation as conflicts of interest subject to the SEC's Regulation Best Interest. **Regulation Best Interest: The Broker-Dealer Standard of Conduct** p. 330.

BOTH THE *CODE AND STANDARDS* AND THE MODEL REGULATION REQUIRE COMPENSATION DISCLOSURE; HOWEVER THE *CODE AND STANDARDS* REQUIRES MORE.

Both the *Code and Standards* and the Model Regulation include requirements to disclose information to the Client, including information concerning compensation. The Model Regulation requires a description of the sources and types of cash and non-cash compensation that "will or may be paid." Model Regulation Appendix A. The Model Regulation does not require the compensation of the producer's firm or other related parties to be disclosed. In contrast, the *Code and Standards* requires a CFP® professional to disclose how the CFP® professional, the CFP® Professional's Firm, and any **Related Parties** are compensated.

Neither the *Code and Standards* nor the Model Regulation explicitly requires disclosure of the amount of compensation that will be received. The Model Regulation provides that if the consumer requests, then the producer shall disclose a reasonable estimate of the amount of cash compensation to be received. The *Code and Standards'* requirement for a CFP® professional to provide sufficiently specific facts about a Material Conflict of Interest similarly requires a CFP® professional to respond to requests for more information about the compensation the CFP® professional or others will receive.

What compensation must be disclosed?

	CFP BOARD	MODEL REGULATION
How the CFP® Professional is Compensated	✓	✓
How the CFP® Professional's Firm or Related Party is compensated	✓	

The *Code and Standards* Also Requires a CFP® Professional to Disclose Conflicts that the Compensation Creates.

Compensation is a Material Conflict of Interest under the *Code and Standards*. Accordingly, a CFP® professional must disclose specifically sufficient facts about the compensation so that a reasonable Client would be able to understand the Material Conflicts of Interest that the compensation creates and give informed consent to such conflicts or reject them. For example, and as shown in a **case study**, when a CFP® professional (or a CFP® Professional's Firm or Related Party) receives a commission or a fee for assets under management, the CFP® professional must inform the Client about the incentive that the compensation creates. A common example of an incentive that needs to be disclosed is if a CFP® professional would earn more for the sale of a recommended product than a reasonable alternative. In contrast, the Model Regulation excludes compensation as a material conflict of interest, with the result that there appears to be no obligation to inform the client how the compensation arrangement could affect the producer's incentives or impartiality.

Why These Differences Matter.

A CFP® professional who provides disclosure that contains *only* the information that Model Regulation Appendix A requires would not fully satisfy the Duty to Provide Information to a Client under the *Code and Standards* and would need to provide additional information to the Client.

OTHER PROVISIONS

The Model Regulation has a Safe Harbor Provision. The *Code and Standards* Does Not.

The Model Regulation has a safe harbor providing that recommendations and sales of annuities made in compliance with comparable standards shall satisfy the Model Regulation requirements. Unlike the Model Regulation, the *Code and Standards* is a professional code of conduct and does not provide a safe harbor for compliance with other standards. A CFP® professional must adhere both to (a) laws, rules, and regulations, and (b) the *Code and Standards*. In cases where the obligation in the *Code and Standards* is higher than the regulatory obligation, the CFP® professional must fulfill the higher obligation.

Both CFP Board and the NAIC Require Continuing Education or Training.

The *Code and Standards* does not have a product training requirement like the Model Regulation, but a CFP® professional is obligated to fulfill their continuing education (CE) requirements every two years.

A CFP® professional has a Duty of Competence. The Model Regulation mandates product training for producers and states, "[a] producer shall not solicit the sale of an annuity product unless the producer has adequate knowledge of the product to recommend the annuity."

The *Code and Standards* Requires More Discussion with the Client than the Model Regulation when a Client Wishes to Purchase a Non-Recommended Product.

When a CFP® professional realizes that the Client's suggested course of action is not, in the CFP® professional's judgment, in the Client's best interests, the CFP® professional must fulfill the Duty of Care and the Duty to Follow Client Instructions. Specifically, and as explained in a **case study**, the CFP® professional must inform the Client of the conclusion that the course of action is not in the best interests of the Client, the CFP® professional's reasons therefore, and the possible consequences of taking the course of action. If the Client specifically directs the CFP® professional to follow instructions that are reasonable and lawful, then the CFP® professional is obligated to follow those instructions. The Model Regulation permits the sale of a product not based on the producer's recommendation so long as the producer obtains a signed statement acknowledging that the consumer is buying an annuity that was not recommended. Model Regulation Appendix C.

CODE AND STANDARDS

A CFP® professional is required to complete 30 hours of CE each reporting period: two hours of CFP Board approved Ethics CE and 28 hours of CE covering one or more of CFP Board's Principal Topics.

The Duty of Competence in the *Code and Standards* requires a CFP® professional to "provide Professional Services with competence, which means with relevant knowledge and skill to apply that knowledge. When the CFP® professional is not sufficiently competent in a particular area to provide the Professional Services required under the Engagement, the CFP® professional must gain competence, obtain the assistance of a competent professional, limit or terminate the Engagement, and/or refer the Client to a competent professional."

MODEL REGULATION

The Model Regulation "safe harbor" applies to financial professionals in compliance with "comparable standards" meaning applicable SEC and FINRA rules including Regulation Best Interest, the fiduciary duties and other requirements imposed on investment advisers by contract or under the Investment Advisers Act, and the duties, obligations, prohibitions, and other requirements under ERISA or the Internal Revenue Code.

The Model Regulation requires a one-time four hour training course for producers selling annuities. Many states also have general continuing education requirements for each renewal period.

Appendix C states: "To recommend a product that effectively meets your needs, objectives and situation, the agent, broker, or company has the responsibility to learn about You, your financial situation, insurance needs and financial objectives. If You sign this form, it means You know that you're buying an annuity that was not recommended."

THIS GUIDE IS BASED UPON AND REFERS TO THE FOLLOWING DOCUMENTS:

Code of Ethics and Standards of Conduct, available at https://www.CFP.net/-/media/files/cfp-board/standards-and-ethics/cfp-code-and-standards.pdf

Guide to Satisfying the Duty of Care When Providing Financial Advice that Does not Require Financial Planning, available at https://www.CFP.net/-/media/files/cfp-board/standards-and-ethics/compliance-resources/duty-of-care-guide.pdf

Guide to Managing Material Conflicts of Interest, available at https://www.CFP.net/-/media/files/cfp-board/standards-and-ethics/compliance-resources/guide-to-managing-conflicts.pdf?la=en&hash=1A557A4D274E1065C5C411E0DF99A316

Case Study: Applying the Fiduciary Duty to a Recommendation to Purchase Proprietary Life Insurance, available at https://www.cfp.net/ethics/compliance-resources/2020/07/applying-the-fiduciary-duty-to-a-recommendation-to-purchase-proprietary-life-insurance

Case Study: The Duty to Disclose and Manage Material Conflicts of Interest Involving Proprietary Products, available at https://www.cfp.net/ethics/compliance-resources/2019/11/the-duty-to-disclose-and-manage-material-conflicts-of-interest-involving-proprietary-products

Case Study: Applying the Fiduciary Duty to Client Instructions that Conflict with the Duty of Care, available at https://www.cfp.net/ethics/compliance-resources/2019/11/applying-the-fiduciary-duty-to-client-instructions-that-conflict-with-the-duty-of-care

Model #275 Suitability in Annuity Transactions Model Regulation, available at https://content.naic.org/sites/default/files/model-law-275.pdf

Suitability in Annuity Transactions Model Regulation (#275), Best Interest Standards of Conduct Revisions, Frequently Asked Questions, available at https://content.naic.org/sites/default/files/inline-files/Final%20FAQ%20July%202021.pdf

Regulation Best Interest: The Broker-Dealer Standard of Conduct, available at https://www.sec.gov/files/rules/final/2019/34-86031.pdf

CFP BOARD

1425 K St NW #800 Washington DC 20005
p 800-487-1497 | f 202-379-2299
mail@cfpboard.org | CFP.net