



Financial Group

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CORPORATE AUTHORISED REPRESENTATIVES

Bull Group Pty Ltd trading as
Bull Financial Group

12 September, 2022

Assistant Secretary
Advice and Investment Branch
The Treasury
Langton Crescent
PARKES ACT 2600

Email: FinancialAdvice@treasury.gov.au

Dear Anna Schneider Rumble,

I am an award-winning Financial Planner, who has been advising for over 37 years, I am a Certified Financial Planner (CFP®) and a SMSF specialist. I have always held an “A” compliance rating.

I am and have been an active part of the many Financial Planning organisations as I am passionate about Financial Planning and it being recognized as a valuable profession. I have been a FPA Wide-Bay Chapter chair, a Value of Advice winner and featured on the FPA website as a good example of what a financial planner could do for you. Most recently, I have been part of an International organisation called Million Dollar Round Table (MDRT) and Top of the Table (TOT) and have spoken at several of their conferences. In October 2019 I was invited to their headquarters in Chicago to contribute to a World Best Practices Forum.

I am recognised as an innovator in the industry for being the first to charge a fee for the first appointment as far back as 1996 and have been asked to speak on this here in Australia and overseas.

I have built a highly successful boutique financial planning practice called Bull Financial Group that is based on a model of service, rather than just a yearly review with my clients. I am extremely proud of the business that I have created and developed since the introduction of FSR in 2001, that enabled me to provide advice and service for my clients, depending on their financial circumstances, their stage of life, and their preferences.

My business has grown on average by 15% a year, the number of staff I employ has grown from 6 to 20 FTE over the last 10 years, and the number of clients has increased.

[Experience should count](#)

When I started advising, degrees in financial planning were not available. In 1985 so I started an accounting degree which I ceased mid way through in order to do the 2-year 8 subject LUA Advanced Financial Planning course on how to be a holistic financial planner.

It was then decided that a Diploma was required, so I completed DFP 1 to 8 which covered the same subjects again and went on to become a CFP® qualified Financial Planner in 1997. I have also completed accreditation to be a SMSF Specialist.

I have also had over 37 years of continuous experience, extensive ongoing CPD (100-200 hours pa) and to be precise in excess of over 7,000 hours over 37 years. (for the detail refer to the end of this submission)

There is no argument that the education standards to provide financial advice needed to be increased from the minimum set in ASICS Regulator RG 146. It is the implementation of any new requirements that needed to be carefully considered, practical, workable, and take into account the impact on both the profession and the clients it serves.

The intent of the original legislation was to raise the minimum education standard of advisers. Back in 2017 the FPA undertook extensive member consultation to assist in developing a response to FASEA's proposed education pathways for existing advisers. This research revealed that the proposed education pathways would likely result in a large number of departures from the profession, resulting in an advice gap that would be to the detriment of consumers.

These were real and valid issues that have played out over the past four years to the detriment of my profession and the consumers it supports. The preservation of the financial profession for those who have long served in it and for the clients they serve should have been the primary focus when implementing change.

FASEA's education pathways for existing advisers, provided no benefit to consumers. The changes did however place significant additional costs on my business both financially and in the loss of valuable time. Most importantly these additional requirements impacted our clients with the reduction in our availability to service them and in the increased cost to provide that advice.

Not everyone, for many reasons has the time or desire **to restudy again**. I constantly study and read to keep up to date to ensure that I have what I need to for my clients, and to meet my CFP requirements but I do not want to study again just to get another piece of paper.

It has been widely advocated through the industry for FASEA to simplify its education pathways and recognise the advice-specific education that existing advisers have already undertaken.

I was very disappointment that FASEA failed to place a value on the experience I have obtained in the last 37 years through the study I have already completed and the on-the-job experience and ongoing professional development I have done. I have also been distressed and disillusioned by the significant detrimental impact that these poorly implemented changes have had on the profession I love, my clients and my colleagues.

I have taken the time to not only do 1-8 **twice** and to get all of these specialist accreditations to set me above the pack but have also spent numerous hours ensuring that my business is recognised as a CERTIFIED QUALITY ADVICE PRACTICE awarded to the top 5% of Advisers and FPA PROFESSIONAL PRACTICE.

I want extensive study present or past to be recognised regardless of its classification.

Advisers should be judged on their ability to do the job, not the year they did their study, if an Adviser has adequately ensured that they have maintained the skills and have a clean compliance record.

Not all financial planners, are the same. I understand some may need extra study, but why take experienced financial planners back to study when there is such a need for quality advice and nowhere near enough advisors to deliver it. Refer to Appendix 1. Below for further details.

I believe that we need to take steps immediately to limit the risk of losing more experienced planners with a spotless compliance record and steps to ensure these planners will be available to assist in the growth of the profession which from the number of calls we receive is desperately required by our community.

What many other advisors and I are asking for is that the requirements need to consider the best interest of the people who electively choose to pay for our services from their own personal resources. **(Our clients and those who want to be clients should be at the core of any decision).**

The Financial Adviser Education Standards consultation paper offers the possibility of striking the right balance between valuing formal education and significant on-the-job experience while continuing to ensure consumer trust and confidence in the advice they receive.

Questions: Experienced Pathway

1. Is the proposed window for determining 10 years' experience (between 1 January 2004 and 1 January 2019) appropriate? If not, what alternative period could be considered?

- Study for study sakes is a waste of resources. It needs to be of benefit to the adviser and the value that they can add to their clients.
- I agree with most of the FPA's recommendations that the following requirements must be met with my changes noted in red:
 1. The 10-year experience pathway should be limited to financial planners who are able to demonstrate 10 years of relevant, licensed experience (listed on the FAR) (personal advice to retail clients) over the period of 1 January 2004 to 1 January 2019; and
 2. Be able to demonstrate a clean record, which should include:
 - a. No disciplinary actions recorded on the FAR;
 - b. Never been suspended or banned from being licensed from any period;
 - c. No material complaint resulting in a client suffering financial detriment found against the planner with AFCA or predecessor EDR schemes;
 - d. No disciplinary action taken by professional associations, if applicable; and
 3. A statutory declaration must be signed confirming the above (with penalties for providing a false declaration);
 4. Either:
 - a. Be a voting member of a non-profit professional association that has:
 - i. A code of ethics, professional standards and an independent disciplinary system;
 - ii. Mandatory CPD obligations;
 - iii. Complaints system; and
 - iv. Quality review program; OR
 5. Complete an approved ethics subject by 1 January 2026; and

Pathway to end **31 December 2036. (About the 50 year anniversary of the birth of FP)**. Any financial planner who wishes to continue to practice after this date would need to meet the education requirements for existing advisers.

2. If required (for example, due to an audit of their eligibility), how can advisers prove they have 10 years' full-time equivalent experience? Clean record

- As above

3. Are the proposed sources for determining a clean record appropriate? Why/why not?

- The proposal that a clean record will, at a minimum, require an adviser to have no disciplinary actions recorded against them on the FAR is fair and reasonable, however I also see a fair argument for ignoring 1 very minor complaint as anyone can be unlucky once, (ie an admin issue lead to the complaint not necessarily bad advice from the Adviser. If this was a repeat occurrence, then special consideration of the circumstances should be made not a hard and fast ruling.

4. What other sources could advisers rely on to indicate that they have a clean record?

- Australian Financial Services Licensee Audits
- Report from the Australian Financial Complaints Authority
- Any disciplinary action taken by professional associations against their members
- Report from ASIC

5. If required, what evidence can advisers rely on to prove they have a clean record?

- Be able to demonstrate a clean record, which should include:
 - No disciplinary actions recorded on the FAR;
 - Never been suspended or banned from being licensed from any period;
 - No material complaint resulting in a client suffering financial detriment found against the planner with AFCA or predecessor EDR schemes;
 - No disciplinary action taken by professional associations, if applicable; and
- A statutory declaration must be signed confirming the above (with penalties for providing a false declaration);
- Either:
 - Be a voting member of a non-profit professional association that has:
 - A code of ethics, professional standards and an independent disciplinary system;
 - Mandatory CPD obligations;
 - Complaints system; and
 - Quality review program; OR

6. What threshold should be adopted to identify whether conduct is minor, trivial, and isolated?

- Trivial is something that might appear in licensee audits as a commonly noted omission but does not overall impact the quality of the advice or the outcome to the client.
- Isolated is as it states – a one of event that has occurred. This might be eg. A failed audit but with the understanding of why that audit was failed – some licensees still have a huge compliance regime in order to meet audit and it can be support staff that fail an adviser's audit – not the advice itself. If a clean record was in doubt because of a failed audit this would need to be scrutinized as to what the determining factors in the failure – admin or advice.

7. Is the non-time limited clean record requirement appropriate? If not, for what period should an adviser be expected to maintain a clean record to access this pathway? Assessment of eligibility

- Eligibility for advisers to access the experience pathway should not be a noose around the proverbial neck.
- Once the exemption has been granted the same ongoing requirements should apply to all advisers.
- Why would it be necessary to create explicit powers for regulators to be able to order additional formal education to be completed?
- If a degree qualified adviser is found guilty of misconduct will additional formal education be required of them and what will the benefit of the possible additional formal education?

8. What should self-declaration of eligibility require? For example, should an adviser have to make a statutory declaration?

- An application to the licensee with an attached statutory declaration should suffice.

9. Are new tools required to specifically deal with advisers accessing the experienced pathway whose future conduct amounts to misconduct? Why/why not? Other

- No new tools are required as no matter which financial adviser education requirements pathway an adviser has qualified under once qualified and ensuring compliance with continued professional development and adviser who qualified under the Experience Pathway who had a clean record should be treated no differently to a counterpart who qualified under the one of the two other pathways.

10. For existing advisers not eligible for the experienced pathway but who have a foreign qualification at AQF 7 level or above, is it practical and appropriate for education providers or licensees to assess how these qualifications meet the education standard and what additional study may be required, rather than the Minister? Why/why not?

- If the education providers are going to be able to self-declare that their courses cover the core knowledge areas there is no reason why they would not be able to assess the foreign qualifications to ensure that they cover the core knowledge areas.
- If I however employed an overseas Adviser regardless of regulations; before I let them operate unsupervised I would want to know that they have an adequate level of understanding of Australian:
 - rules and regulations
 - products
 - tax
 - estate planning
 - Centrelink

11. How many existing advisers do you expect to access the experienced pathway? How many of those have already started to undertake formal education to align with the current existing adviser requirements?

- It is vital that education pathways for existing advisers recognise the credible education available at the time they began their Advising Career, which the FPA have surveyed affected approximately 66% of the profession prior to the establishment of FPEC.

12. What else may be required to ensure an appropriate level of consumer protection is maintained and any potential harm is minimised?

- If the financial adviser with the significant experienced has maintained a clean record up to this point in their career, why would recognising their experience as an education pathway predispose them to being an increased risk for doing harm to clients.
- The significant study and experience to date, passing the FASEA exam, a clean record and the requirement to abide by a code of ethics should provide the consumer and regulators with confidence that this group of financial advisers would be less of a risk of causing harm to clients.

13. Would any further requirements be necessary for the experienced pathway to ensure the professionalisation of the industry is maintained?

- No, if extensive study present or past is recognized, Financial Planners should be then judged on their ability to do the job, not the year they did their study, if they have adequately ensured that they have maintained the skills and have a clean compliance record.
- Not all financial planners, are the same. I understand some may need extra study, but why take experienced financial planners back to study when there is such a need for quality advice and nowhere near enough advisors to deliver it.
- More regulation and more study for study sakes only weighs down those doing the right thing; it does not make the dishonest honest.

Questions – Formal education and exam

- **Are the proposed core knowledge areas appropriate for the financial advice profession? If not, what is missing and why is that area important?**
 - The current core knowledge area framework provides a solid foundation for understanding the context and obligations for working the financial planning industry however tax and commercial law seem disjointed. The later 'core areas' are more technical knowledge centric and relate to other professions which are not areas of day-to-day financial planning with the majority of mum and dad clients. It seems more appropriate to have Taxation and Commercial Law as specialisations and areas such as superannuation and insurance as 'core'.

- **Are there any specific areas under each core knowledge area that should be prioritised or emphasised? For example, a particular element of taxation or commercial law?**
 - The current content of the Graduate Diploma of Financial Planning (Kaplan) covered these topics adequately. These being: Economic and Legal Context for Financial Planning, Ethics and Professionalism in Financial Advice, Superannuation and Retirement Advice, Insurance Advice, Estate and Succession Planning, Taxation for Financial Planning, Client Engagement Skills and Investment Advice.

and

 - depending on your area of specialization other topics could be added such as Securities (including listed securities and debt securities), Exchange traded funds and Listed investment companies, Salary packaging, Self-managed superannuation funds (SMSF), Aged care, Commercial law should be specialized subjects rather than core competency as they are not areas of day-to-day financial planning.

- **Would proposed changes to core knowledge areas necessitate changes to the exam content? Why/why not?**
 - No.

- **Is it practical and appropriate to allow education providers to self-declare that their degrees teach the core knowledge areas? Why/why not?**
 - If there was an agreed core standard that they providers needed to guarantee, then yes
 - The Financial Planning Education Council FPEC has worked tirelessly over the past ten years to improve the availability of financial planning bachelor's degrees and as such, set the foundation on which FASEA built the approved course list and eligibility criteria, and the assessment FASEA used for approving courses. The FPA was pleased that FASEA had adopted the well-established FPEC Curriculum and Accreditation Framework for approved degrees, particularly in relation to new financial advisers – from FPA draft.
 - As the peak industry body, the FPA'S FPEC has the experience and track record to ensure that the recognised degrees teach the core knowledge areas they could be tasked with evaluating and approving relevant tertiary qualifications/courses.

- **What form should education providers' assurance to Government take?**
 - If there was an independent body overseeing this process education providers would no need to provide assurances. As stated above, the peak industry body the FPA'S FPEC has the experience and track record to ensure that the recognised degrees teach the core knowledge areas they could be tasked with evaluating and approving relevant tertiary qualifications/courses. This would provide assurance to the government that all qualifications met the required standard.

- **If self-declaration is not appropriate, what alternatives could be adopted to streamline the degree approval process?**
 - Stated above, the peak industry body the FPA'S FPEC has the experience and track record to ensure that the recognised degrees teach the core knowledge areas they could be tasked with evaluating and approving relevant tertiary qualifications/courses.

- **Is it practical and appropriate for education providers or licensees to evaluate a new entrants' completed tertiary courses against the new core knowledge areas to assess whether they have met the education standard or what additional study may be required? Why/why not? What oversight of education providers or licensees making this assessment, if any, is necessary?**
 - No, It is not practical or appropriate for education providers or licensees to evaluate new entrants as there could potentially be too much variance between licensees and what they feel are the areas of importance or areas that dont suit their own business. This needs to be assessed by an independent body to the education provider or the licensees so there is reduced opportunity for bias in their evaluation and decision. Again this may be an area that the financial planning professions peak body is most suitable to handle.

- **Is it practical and appropriate for education providers or licensees to also evaluate foreign qualifications against the new core knowledge areas and assess what additional study may be required, rather than the Minister? Why/why not?**
 - The FPA, the Financial Planning peak professional body has worked tirelessly over the past ten years to improve the availability of financial planning bachelor degrees and as such, set the foundation on which FASEA built the approved course list and eligibility criteria, and the assessment FASEA used for approving courses. The FPA was pleased that FASEA had adopted the well-established FPEC Curriculum and Accreditation Framework for approved degrees, particularly in relation to new financial advisers.
 - As the peak industry body the FPA'S FPEC has the experience and track record to ensure that the recognized degrees teach the core knowledge areas. With capability to evaluate the suitability of Australian Degrees there is no reason why the FPEC could not also evaluate foreign qualifications against the prescribed knowledge area.
- **Should new entrants whose existing qualifications don't fully meet the education standard be able to 'top-up' their qualification by completing individual units, rather than a full qualification? Why/why not?**
 - Yes, for example an accountant should get an exemption for taxation and a lawyer for estate planning however financial planning is the holistic financial health of a person so all other areas need to be studied to give the qualifications to give holistic advice or at least be able to recognise when a client should be referred on if it is an area an adviser is not qualified to provide advice in.
- **What other changes should be made to the education requirements for new entrants? How do your proposed changes support the professionalisation of the financial advice industry and ensure consumer protection?**
 - I don't see any reason to change the professional year. I have a current PY student who is in Q4 on our team. Other than the fact that he is more experienced than some of my Degree Qualified staff and if he was treated fairly by his last employer, he wouldn't have had to restudy a degree and complete a PY. The PY is very similar to exactly what we already required all new advisers to complete when they start with our firm.
 - A) to ensure that they were competent before we gave them the privilege to lead the financial health process that our firms reputation is built on.
 - B) to ensure that they understood the culture, philosophies and strategies that our firms clients like and refer us for.
- **How else could the professional year be amended to ensure it remains fit for purpose, ensuring appropriate supervision of graduate financial advisers without creating unnecessary barriers to entry?**
 - I don't see any reason to change the professional year. Refer to above.
- **In what ways do the professional year requirements create a barrier to entering the financial advice profession? The rigidity of the 12 months.**
 - If any change to the professional year is made it should be at the discretion of the supervisor/s and Licensee to structure the development of the adviser and to progress the PY adviser when they are ready to progress, especially if they have worked in Financial Planning for a firm as a significant support person; not based on a date as it is there business and reputation that is on the line if the PY adviser fails to act as required or to standard.
 - Also, they should be able to sit their FASEA exam when they feel they are ready.

What are the risks and benefits of the possible amendments?

- The risk is the adviser is unable to achieve all the training as expected and be an ineffective adviser however if the adviser is able to grasp this exceptionally well eg a long time CSO who has worked in the industry, they do have an advantage above a person with no experience in the FP industry despite any

formal education. It would be these types of people who are trying to progress in an industry they are already working who would benefit and it may be determined by their supervisor and licensee as being ready to advise solo more quickly than the 12 months.

Will allowing integration of the professional year with tertiary study streamline the transition between education and work? Why/why not?

- n/a as I don't believe the PY needs change

If the professional year is integrated into tertiary study, how many professional year work hours should be completed as part of a degree?

- n/a, as I don't believe the PY needs change

What role does industry play in encouraging new entrants into the industry?

- If the industry became a place that current Advisers could see a future for themselves those Advisers would invest in and encourage others. The emphasis right now has to be on retaining the quality experienced Advisers left first. If we don't, who will the new entrants learn from. It would set Financial planning back to the 80's and 90's without long term experienced Advisers to share, train and encourage new entrants.

Should the exam format be changed for new entrants? If so, how?

- No change required.

I appreciate you taking the time to understand my concerns and thoughts based on many years of experience.

I look forward to getting back to the thing that I love the most, which is helping our clients.

Yours sincerely



Experience should count continued ..

Under new FASEA requirements, Financial advisors were required to complete an exam and undertake further study to achieve degree equivalence, meet new Continuing Professional Development standards, and comply with a new Code of Ethics.

Experience should count, for me and many in the industry, there needs to be a pathway for recognition for someone with my qualifications and specialised industry experience.

It is my understanding that I am required to do 5 subjects (approx. 1,000 hours) whilst running a business on top of my CPD (approx. 100-200 hours per year).

Experience should count.

To put it into perspective, I was studying accountancy in 1985 and 1986 when I ceased it to commence studies in Financial Planning.

Here is a summary of my Study and Recognition of Prior Learning:

Years to Compete	Study	Credits
2 years	1987-1989 LUA Advanced Financial Planning (units 1-8 covering Investment Fundamentals, Superannuation, Retirement Planning, Income Streams, Insurance, Taxation, Estate Planning and Centrelink and Veteran Affairs)	0
Coupled with motherhood and running a business full-time 6 years	1992-1998 Diploma of Financial Planning (units 1-8 a deeper dive into all the topics above)	2
	CFP® Qualified Financial Planner	0
1 year	SMSF Specialist Advisor (<i>designation completed in or after 2005</i>)	1
Numerous years	Further studies to be recognised as a Superannuation Specialist, Retirement Income Specialist, Direct Share Specialist, Debt Management Specialist, Salary Packaging Specialist, Insurance Specialist, Aged Care Specialist, Estate Planning Specialist.	0
37 years	37 Years of Experience	0
37 years	Annual CPD Requirements (100-200 hours pa in total excess of over 7,000 hours)	0
	Total	3
Coupled with the responsibility of running a business full-time likely to take 5 years	Gap – FASEA approved Graduate Diploma including: Ethics for Professional Advisors bridging course Financial Advice Regulatory & Legal Obligations bridging course Behavioural Finance: Client and Consumer behaviour, Engagement and Decision Making; and Two further FASEA approved courses	5
	Total Requirement	8

To take experienced financial planners back to study when there is such a need for quality advice and nowhere near enough advisors to deliver it does not make sense.

Do other professionals, who have been practicing for 20 years or more, have to go back and re-do their education because there have been changes in how they categorise the training since they started?

Our ongoing CPD already insures we stay abreast of any changes.

In my 37 years of continuous experience, extensive ongoing CPD (100-200 hours pa) and to be precise in excess of over 7,000 hours over 37 years in the areas of:

- Investments strategies (strategic asset allocation and goals-based investing)
- Budget and cash flow management
- Debt management (including borrowing for personal and investment purposes)
- Salary packaging
- Superannuation strategies and retirement planning
- Self-managed superannuation funds (SMSF)
- Taxation
- Personal insurance
- Centrelink, Veteran Affairs and other government benefits
- Estate planning
- Aged care
- Managed investments
- Deposit and payment products (incl. term deposits, cash management accounts and non-cash payment products)
- Standard margin loans
- Retirement income streams, including pensions and annuities
- Ongoing advice and services, including regular portfolio reviews
- Personal and group Insurance (life cover, disability, income protection and trauma)
- Life investment products including whole of life, endowment and bonds
- Securities (including listed securities and debt securities)
- Exchange traded funds and Listed investment companies
- Arranging listed securities, shares and debentures to be bought and sold via a platform and broker.
- Various structured products, instalment warrants over managed funds and protected equity loans
- Investor directed portfolio services
- Investment guarantees
- Ethics
- And many other Sundry areas required to be a leading Financial Planner

I employ a team of approx. 20 FTE to help me, help my clients, all who I have either assisted to learn Financial Planning from scratch or to take their skills to a superior level and **all who would provide written testimony that workplace experience and training was of greater value than formal learnings.**

I am currently supervising a new adviser whilst he undertakes a professional year and will be supervising another new adviser after that. This all takes time. I help accountants and solicitors work out solutions for complicated clients.

I could just retire with my clients in 2026 but who will look after them and lead my team. That is not what I want, **nor what my team want or what my clients want**, but I also don't want to do a degree that adds little value to what I can do for my clients. I have numerous staff who are studying or who have recently completed their Degree. If there is anything out there that they think I don't know they bring it to my attention.

If clients still want to see me because of the excellent financial position I have put them or their family in over 3 decades after being informed that I am Experienced but not Degree Qualified, shouldn't they have a right.

If I had only repeated my studies once I would have no qualms, but as an Adviser who wanted to be recognised as leading, I have repeated studies numerous times. It is now time for my weekends to be spent with family, friends and on ensuring I maintain my health.

If I am capable of doing the job, why should my career and business be taken from me. It is evident that even both sides of government can see this now and that the only thing stopping the recognition of retaining those that not only have the ability to do the job but are mentors to many in their training is the very groups that should be fighting for fairness for their members.

Extensive study present or past should be recognized regardless of its classification. Advisers should be judged on their ability to do the job, not the year that they did their study if they have adequately ensured that they have maintained the skills and have a clean compliance record. Anything else is discrimination.

37 years of Experience and 36 years of annual CPD should count for something.

My CPD Requirements to ensure that I stay up to date are :

Licensee Minimum 40 hours CPD **per calendar year**

- No more than 30 hours CPD from formal education
- No more than 4 hours professional reading
- Minimum 28 hours (70%) Licensee approved
- Minimum 5 hours in Technical Competence
- Minimum 5 hours in Client Care and Practice
- Minimum 5 hours in Regulatory compliance and consumer protection
- Minimum 9 hours in Professionalism and ethics

CFP Minimum 28 hours (70%) FPA accredited

- CPD must align with ASIC Knowledge Requirements
- Ensure CPD is relevant to the product areas in advice is provided
- Ensure CPD activities accredited by the FPA are relevant to the industry and delivered by individuals of appropriate expertise;

TPB Minimum 40 hours CPE (TPB accredited) **per calendar year**

- Minimum 5 hours Taxation Specific

SMSF Minimum 25 hours CPD (relevant to SMSF) **per financial year**

SMSF Minimum 90 hours CPD (relevant to SMSF) **per 3 years**

We need all CPD to align to the same period ie all to be based on say calendar year not some calendar and other financial year.

I have no problems with a minimum of 40 hours as I often do in excess of 100 hours a year but I do have a problem with 9 hours of Ethics. Once an adviser has completed the ethics unit of the Degree they should only have to do an hour or 2 at the most.