

Objective:

To ensure that all marketing practices involving consumer reviews and testimonials comply with the Federal Trade Commission (FTC) Marketing Reviews and Endorsements rule under [16 CFR Part 465](#).

1. Review Management

- Collect Authentic Reviews:** Ensure reviews describing the reviewer's experience living at a property are from actual residents who have lived there.
- Prohibit Fake Reviews:** Communicate that no fake reviews are to be created, purchased, or solicited by employees or third-party vendors.
- Monitor Review Sources:** Regularly verify the authenticity of reviews and testimonials to ensure they are from genuine sources.

2. Transparency and Disclosures

- Disclose Insider Reviews:** Ensure that any reviews or testimonials authored by employees, management, or their relatives include a clear disclosure of the relationship.
- Third-Party Endorsements:** Confirm that all third-party endorsements (e.g., from influencers) disclose any material connections, such as compensation or incentives.
- Incentives:** Communicate that residents who receive an incentive to write a review, such as a raffle selection or rewards points, should disclose on the review that they received an incentive. Make clear that it is prohibited for any consideration or benefit to be made to a reviewer in expectation of the reviewer expressing a particular view or sentiment.
- Educate Staff on Disclosures:** Provide training to staff on the importance of proper disclosure practices for all reviews and endorsements, such as resident reviews resulting from company events, reward programs, raffles, and campaigns.

3. Review Display and Manipulation

- Fair Display of Reviews:** Make sure that both positive and negative reviews are displayed fairly without suppression or selective filtering.
- Avoid Review Hijacking:** Ensure that reviews are not repurposed from one property or service to another unrelated one.
- Prohibit Suppression:** Confirm that no legal or physical threats are being used to remove or alter negative reviews, and that any reputation management activities do not suppress legitimate reviews.

4. Social Media Influence

- Avoid Fake Social Media Indicators:** Ensure that no fake followers, likes, or shares are purchased or used to artificially boost the company's online presence.
- Monitor Social Media Practices:** Regularly audit social media activities about company properties by all posters and commenters to ensure compliance with the FTC rule.

5. Training and Communication

- Employee Training:** Provide routine training sessions for employees on FTC guidelines and company policy regarding consumer reviews, testimonials, and social media practices.
- Update Marketing Policies:** Ensure that internal marketing policies are up-to-date and align with FTC regulations.
- Vendor Compliance:** Verify that all third-party vendors involved in managing reviews or social media are aware of and comply with FTC rules.

6. Monitoring and Enforcement

- Conduct Regular Audits:** Schedule regular audits of review and testimonial practices by residents, employees, and third-party agencies to ensure ongoing compliance.
- Enforce Policy Compliance:** Flag non-compliance with the FTC rule, including potential disciplinary actions, such as employee re-training and vendor termination.
- Document Compliance Efforts:** Maintain records of all compliance activities, including audits, training sessions, and any corrective actions taken.

Legal Disclaimer

The information contained in this document is for general interest and informational purposes only and is not intended to constitute specific legal, commercial or other professional advice. It should not be relied on or treated as a substitute for specific advice relevant to particular circumstances. While we seek to ensure that the contents are not misleading or outdated, you should obtain specific legal advice before making or refraining from making any business or personal decisions.

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