

National Reverse Mortgage Lenders Association
Annual Meeting

October 28-30, 2018 San Diego, CA



Digital Marketing Compliance Roundtable

Session Topic



In today's session, we're going to examine compliance issues related to generating reverse mortgage leads using digital marketing techniques.

We're going to review digital ad examples and discuss compliance concerns related to Pay-Per-Click and Facebook Ads, Landing Pages and Email Marketing in light of State advertising scrutiny.

Digital Marketing Compliance Roundtable

Presenters



Jim Berkowitz, Founder, Lead Growth Consultant,
LaunchHawk Marketing, LLC, Telluride, CO



Melissa Klimkiewicz, Partner, Buckley Sandler
LLP, Washington, DC



Soroush Shahin, Associate, Weiner Brodsky Kider
PC, Washington, DC

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Disclaimer



Disclaimer

- The contents herein, and all related discussions, are informational in nature only, and do not constitute, and are no substitution for, legal advice.
- Receipt or use of this information shall not in any way create or be construed as an attorney-client relationship or the creation thereof, and any communications absent such a relationship are not protected.
- The contents herein, and all related discussions are not intended as a solicitation of legal advice.

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Google Pay-Per-Click (PPC)



Fast Reverse Mortgage Calculator/ Homeowners 62+ Are Eligible

Ad www.abcreversemortgage.com/calculator

Calculate Your Personalized FREE Reverse Mortgage Quote in less than 1 Minute. What A Reverse Mortgage Can Do For You. Get Started Right Away. Age 62+ Are Eligible. Competitive Rates.

Top Reverse Mortgage Lender/ Your Choice Makes A Difference

Ad www.lmreversemortgage.com/

The Lender You Choose Will Impact Your Fees and Rates. Choose Your Lender Carefully. Don't Pay Third Party Originator Fees. We Lend Direct Without a Middleman. Licensed Professionals.

(Recommended) Best FHA Reverse Mortgage Lender

Ad www.xyzreversemortgage.com/best_rated

The Nation's Best Rated HECM Lender. Over 10 years Of Best Rating. FHA Approved.



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Google Search PPC



John Smith - Reverse Mortgage Specialist
5.0 ***** (3) Mortgage Broker
Office Address



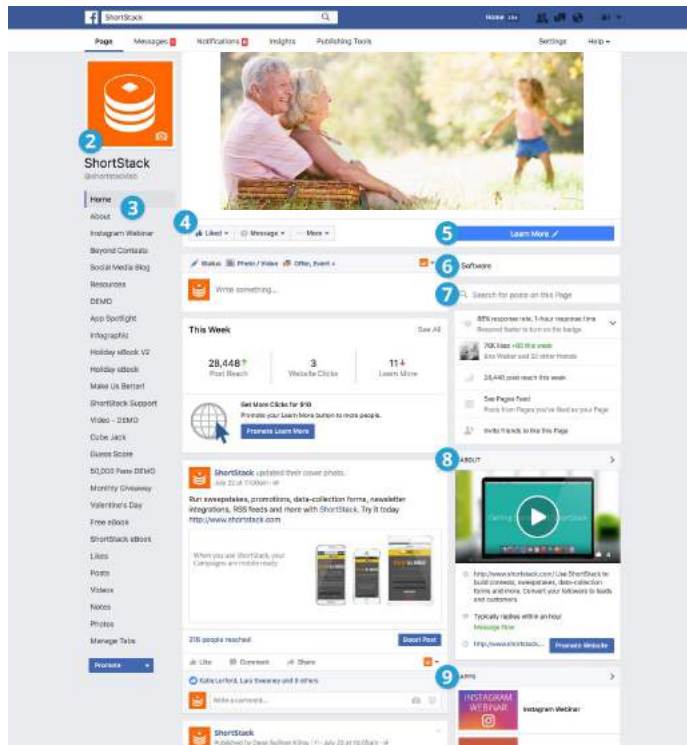
ABC Mortgage Company
No Reviews - Mortgage Lender
Office Address



NRMLA Annual Meeting

Digital Marketing Compliance Roundtable

Facebook Page

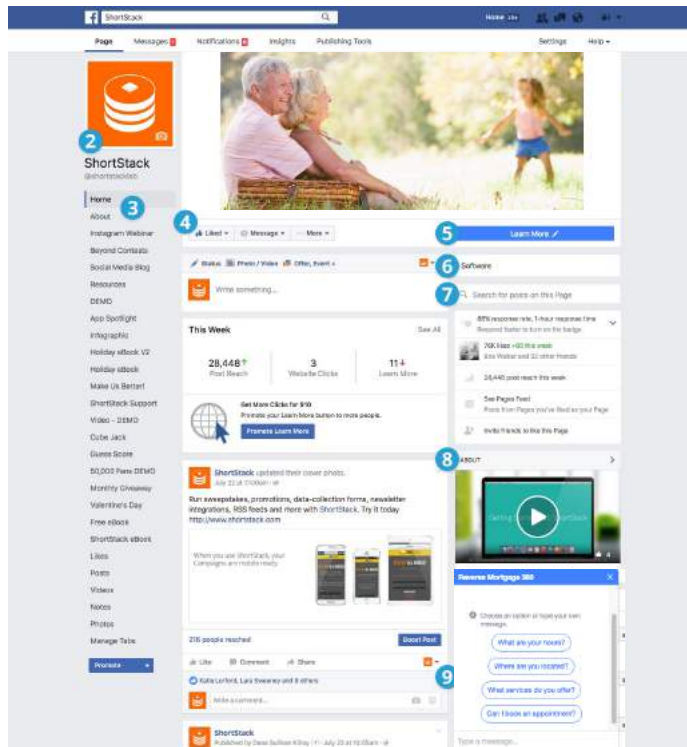


What is required to make a Facebook Page Compliant?

Are Facebook Ads that Promote the Page (For Getting More People to Like the Page) Compliant?

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Facebook Page



What is required to make a Facebook Page Compliant?

How about if when you arrive at the page, the Message Box pops open with pre-defined questions the message “bot” can answer?

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Facebook Page Posts

10 Tips to Control Expenses in Retirement <https://buff.ly/2MLGDYK>



31
People Reached

0
Engagements

0
Clicks

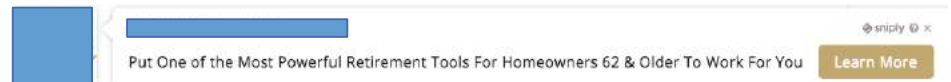
Boost Post

Is a Post that links to a third-party article an ad?

How about if it's "Boosted" to an audience that is in your area but doesn't follow your page?

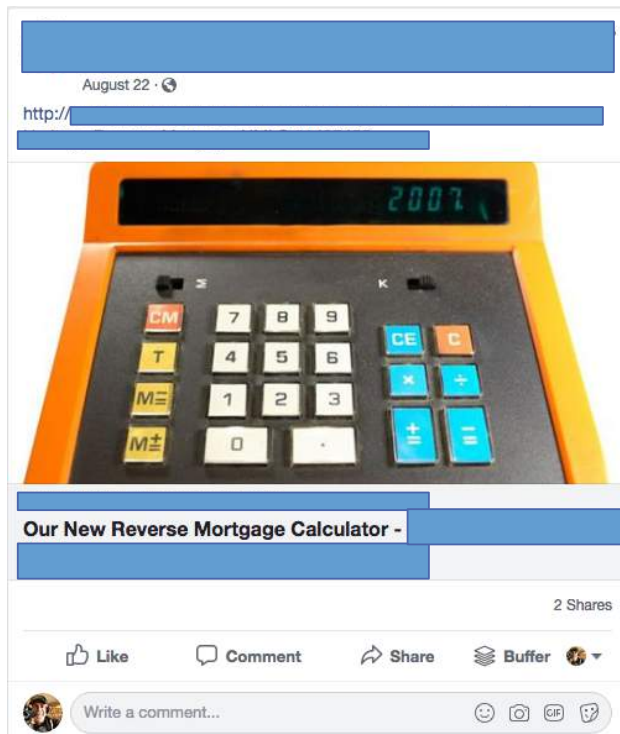
How about if when the person goes to the article - ex. (in U.S. News & World Report) and a banner displays at the bottom of the article with a call to action .

How about posts that link to third-party news articles that discuss Reverse Mortgages?



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Facebook Page Posts

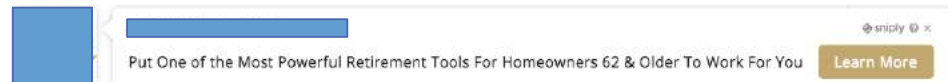


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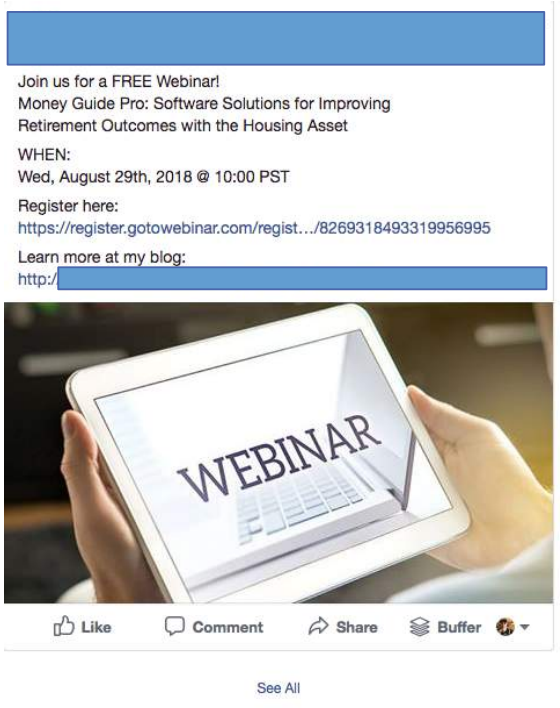
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Facebook Page Posts (Webinar)



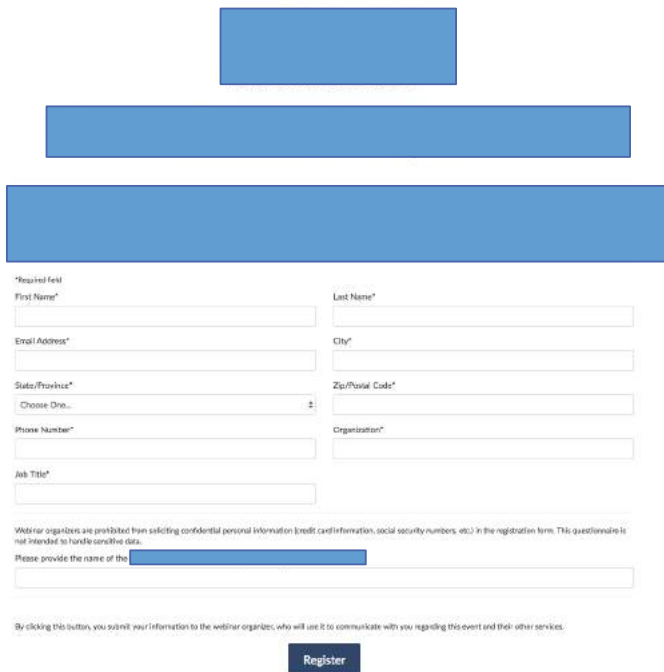
How about posts or ads that promote a webinar and go to a webinar signup page?

How about if a financial planner promotes a webinar on Facebook that a reverse mortgage lender is going to conduct for the financial planner's clients.

Any particular compliance requirements for the actual webinar?

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Facebook Page Posts (Webinar)



*Required Field

First Name*

Last Name*

Email Address*

City*

State/Province*

Zip/Postal Code*

Choose One...

Phone Number*

Organization*

Job Title*

Webinar organizers are prohibited from soliciting confidential personal information (credit card information, social security numbers, etc.) in the registration form. This questionnaire is not intended to handle sensitive data.

Please provide the name of the

By clicking this button, you submit your information to the webinar organizer, who will use it to communicate with you regarding this event and their other services.

How about posts or ads that promote a webinar and go to a webinar sign-up page?

How about if a financial planner promotes a webinar on Facebook that a reverse mortgage lender is going to conduct for the financial planner's clients.

Any particular compliance requirements for the actual webinar?

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Facebook Page Posts (Video)



How about posts or ads that promote a video and go to a YouTube or Vimeo page?

Any particular compliance requirements for the actual video and YouTube/Vimeo pages?

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Facebook Lead Ad



Convert part of your home's equity into cash that you can use for anything you choose. Learn more about a versatile tool that millions of senior homeowners have used to age-in-place and so much more.



**Helping Seniors Achieve
Financial Stability**

Learn More

https://[redacted]



Like



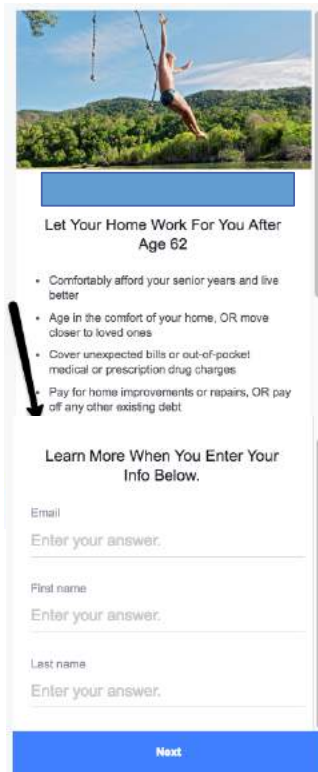
Comment

Here's an example of a Facebook Lead Ad (that captures lead information within the Advertiser's Facebook account. What are the compliance issues with it?

If they "click" the "Learn More button they go to a second screen.

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Facebook Lead Ad



The image shows a vertical Facebook lead ad. At the top is a photograph of a person swinging on a swing set in a park. Below the photo is a blue header with the text "Let Your Home Work For You After Age 62". Underneath is a list of four bullet points: "Comfortably afford your senior years and live better", "Age in the comfort of your home, OR move closer to loved ones", "Cover unexpected bills or out-of-pocket medical or prescription drug charges", and "Pay for home improvements or repairs, OR pay off any other existing debt." Below the list is a blue button that says "Learn More When You Enter Your Info Below.". Under the button are three input fields for "Email", "First name", and "Last name", each with the placeholder text "Enter your answer.". At the bottom is a blue button that says "Next". A black arrow points to the "Learn More" button.

Here's an example of a Facebook Lead Ad (that captures lead information within the Advertiser's Facebook account. What are the compliance issues with it?

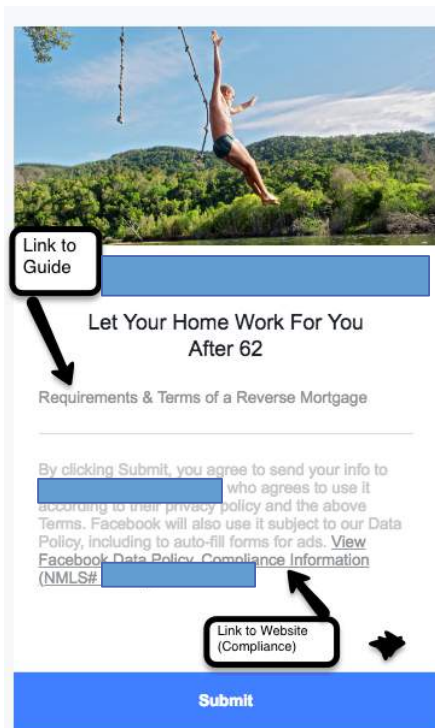
If they "click" the "Learn More" button they go to a second screen.

Are Facebook ads that promotes to "Learn More" (about possible benefits) and never mentions Reverse Mortgages or HECMs subject to reverse mortgage compliance disclosures?

If they "click" the "Next" button they go to a third screen.

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Facebook Lead Ad



Here's an example of a Facebook Lead Ad (that captures lead information within the Advertiser's Facebook account. What are the compliance issues with it?

If they "click" the "Learn More" button they go to a second screen.

Are Facebook ads that promotes to "Learn More" (about possible benefits) and never mentions Reverse Mortgages or HECMs subject to reverse mortgage compliance disclosures?

If they "click" the "Next" button they go to a third screen.

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Facebook Traffic Ad



Learn more about the reverse mortgage home loan that nearly a million senior homeowners have used to age in place, improve their financial stability and enjoy a better quality of life. Try our free calculator to see how much cash you may qualify for. Note: This advertising material is not from HUD or FHA, and was not approved by HUD, FHA, or any government agency. An Equal Opportunity Lender. [REDACTED] NMLS # [REDACTED]



Adventures Still Await in Your Golden Years
Helping You to Live Better in Your Retirement Years.

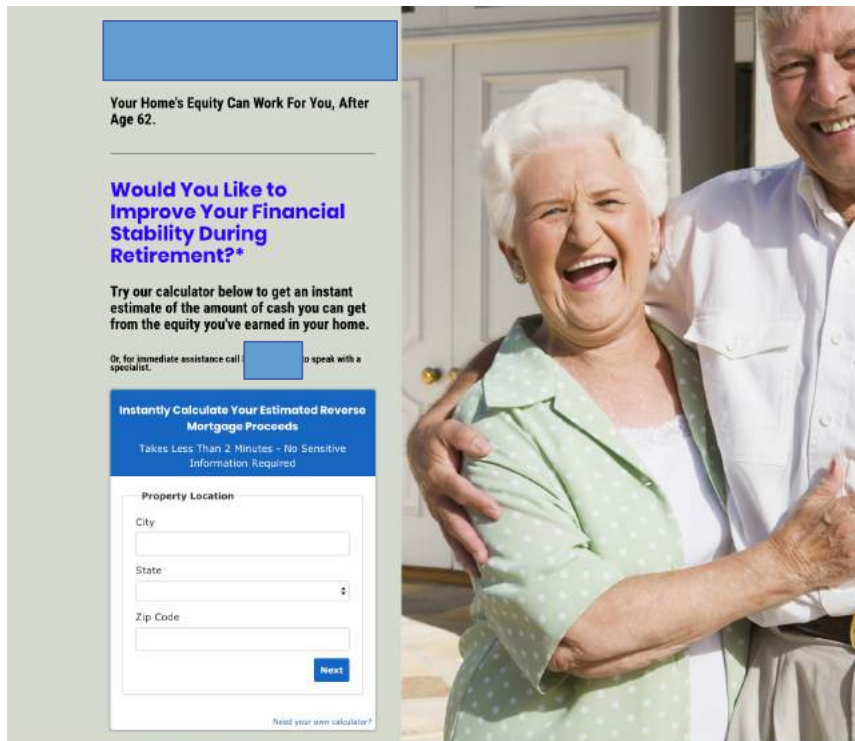
[REDACTED] [Learn More](#)

[Like](#) [Comment](#) [Share](#) [Buffer](#)

Here's an example of a Facebook Traffic Ad (that goes to an off-Facebook landing Page to capture lead information). What are the compliance issues with it?

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Facebook Traffic Ad



Your Home's Equity Can Work For You, After Age 62.

Would You Like to Improve Your Financial Stability During Retirement?*

Try our calculator below to get an instant estimate of the amount of cash you can get from the equity you've earned in your home.

Or, for immediate assistance call [redacted] to speak with a specialist.

Instantly Calculate Your Estimated Reverse Mortgage Proceeds
Takes Less Than 2 Minutes - No Sensitive Information Required

Property Location

City:

State:

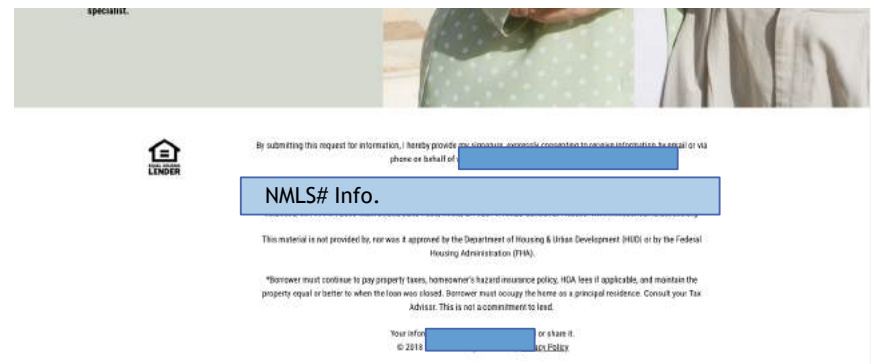
Zip Code:

*Need your own calculator?




Here's an example of a Facebook Traffic Ad Landing Page that captures lead information. What are the compliance issues with it?

Here's the compliance information that appears on the bottom of the landing page:



specialist.

 By submitting this request for information, I hereby provide my consent, permission, authorization to release information by email or via phone or behalf of [redacted]

NMLS# Info. [redacted]

This material is not provided by, nor was it approved by the Department of Housing & Urban Development (HUD) or by the Federal Housing Administration (FHA).

*Borrower must continue to pay property taxes, homeowner's hazard insurance policy, HOA fees if applicable, and maintain the property equal or better to when the loan was closed. Borrower must occupy the home as a principal residence. Consult your Tax Advisor. This is not an commitment to lend.

Your info [redacted] or share it. [redacted]
© 2018 [redacted] Privacy Policy

Digital Marketing Compliance Roundtable

Emails

Hi Joe,

It's _____, with _____.

As a member of your dedicated reverse mortgage lending team serving mortgage loan originator focusing on reverse mortgages in _____, I would love the opportunity to talk with you about the many benefits available from the Reverse Mortgage program that President Ronald Reagan signed into law in 1988 reverse mortgages.

I've seen thousands of lives transformed by these loans and feel strongly that every eligible senior deserves to know if they may qualify and evaluate how this program may be able to possibly make a positive difference in their financial life help you.

Here are just a few of the possible benefits of a Reverse Mortgage:

* Upon taking out a reverse mortgage you continue to maintain ownership of your home.

*****However, at the conclusion of a reverse mortgage, you must repay the loan and may have to sell the home or repay the loan from other proceeds. Further, failure to pay property taxes and homeowner's insurance may result in loss of the home or foreclosure.

* You do not have to pay a monthly mortgage payment with a reverse mortgage.

*****However, you are responsible for property taxes, hazard insurance and home maintenance, and failure to pay these amounts may result in the loss of the home.

What are the compliance disclosures required in emails about reverse mortgages that are sent to previously generated prospects and leads?

Here's an example of an email that was reviewed by a compliance officer – who noted that the items in red must be removed from the email and the items in blue are disclosures that a compliance officer insisted must be in the body of the email and not at the end of the email.



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Emails

- * You are protected no matter what happens to the housing market.
- * You may choose how to receive and use your money.
- * Social Security and Medicare benefits are never affected.
- * You are more protected with a Reverse Mortgage than with a Home Equity Line of Credit.

**** You should also know that charges will be assessed with the loan, including an origination fee, closing costs, mortgage insurance premiums and servicing fees. Further, the loan balance grows over time and interest is charged on the outstanding balance. Interest on a reverse mortgage is not tax-deductible until you make partial or full re-payment.

Please Click here to watch an NBC News video about how reverse mortgages are helping senior homeowners. Please note that this video is not from HUD or FHA, and was not approved by HUD, FHA, or any government agency.

Joe, I'd love to explore the possibility of making a positive difference in your financial life. discuss the reverse mortgage program with you.

Give me a call today at xxx-xxx-xxxx for a brief, no-obligation discussion. Or, just email me back your phone number and I'll give you a call. It will only take me a few minutes to provide you with an estimate of the loan amount for which you may qualify.

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Emails

(a) As long as you meet the ongoing obligation to pay property taxes, property insurance, HOA dues if applicable, maintain your home and comply with the loan terms.

(1) At the conclusion of a reverse mortgage, the borrower must repay the loan and may have to sell the home or repay the loan from other proceeds;

(2) Charges will be assessed with the loan, including an origination fee, closing costs, mortgage insurance premiums and servicing fees;

(3) The loan balance grows over time and interest is charged on the outstanding balance;

(4) The borrower remains responsible for property taxes, hazard insurance and home maintenance, and failure to pay these amounts may result in the loss of the home; and

(5) Interest on a reverse mortgage is not tax-deductible until the borrower makes partial or full repayment.

This is an advertisement. The Company's advertising material is not from HUD or FHA, and was not approved by HUD, FHA, or any government agency.

If you'd like to unsubscribe and stop receiving these emails [click here](#).

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