



Wisconsin REALTORS® Association
4801 Forest Run Road, Suite 201
Madison, WI 53704
608-241-2047
www.wra.org

2027 Practice Changes: Advertising Modified by Technology

Furthering Transparency. Encouraging Innovation.

Beginning January 1, 2027, Wisconsin's 2027 Practice Changes establish new disclosure requirements for real estate advertising that has been altered or modified using technology, including artificial intelligence (AI). Unlike the new public marketing and compensation requirements, these advertising provisions apply to all property types. The following FAQs are current as of October 12, 2026.

General Overview

1. What do the 2027 Practice Changes require regarding advertising modified by technology?

Beginning January 1, 2027, Wis. Stat. § 452.136 requires a licensee to disclose when advertising has been altered or modified using technology, including artificial intelligence (AI), in a manner that adds, removes or changes an element of the property and creates a false or misleading impression of the property.

The new law does not prohibit the use of technology in real estate advertising. Rather, it requires transparency when technological alterations create a false or misleading impression of the property.

2. Does every use of artificial intelligence or other technology require a disclosure?

No. The disclosure requirement is not triggered simply because AI or another technology was used.

The important questions are whether technology was used to add, remove or change an element of the property and whether the alteration creates a false or misleading impression of the property.

The requirement applies to technology generally, not just AI. The focus is on what was changed and the impression the resulting advertisement creates, rather than the particular software or technology used.

3. Does the disclosure requirement apply to all types of real estate advertising?



Wisconsin REALTORS® Association
4801 Forest Run Road, Suite 201
Madison, WI 53704
608-241-2047
www.wra.org

Yes. The new requirements apply to all property types and are not limited to a particular advertising medium.

If a licensee advertises a property on social media, a website, an MLS, in an email, in printed materials or through another advertising platform, any required disclosure should be included in the advertising.

The requirements also are not limited to photographs. They may apply to videos, virtual tours and other advertising materials altered using technology.

Common Examples

4. Does virtual staging require a disclosure?

As a best practice, licensees should disclose whenever an image has been virtually staged.

Virtual staging can add furniture and décor to an empty room, but it can also replace flooring, alter cabinets, change landscaping or depict renovations that have not occurred.

Even seemingly simple virtual staging can affect a consumer's impression of the property. Digitally added furniture or décor may obscure portions of a room, potentially concealing an existing feature or condition such as stained carpet, damaged trim or part of a window.

Although not every instance of virtual staging will necessarily satisfy the statutory disclosure requirements, the recommended practice is straightforward: If an image has been virtually staged, disclose it.

A disclosure such as "Virtually Staged" lets consumers know that portions of the image do not depict the property exactly as it exists.

5. Does removing clutter or personal property from a photograph require a disclosure?

It depends on whether the alteration creates a false or misleading impression of the property.

For example, digitally removing a few personal items from a countertop may not necessarily misrepresent the property. However, removing furniture or other items that conceal damage or changing the image in a way that misrepresents the property's condition may trigger the disclosure requirement.

Licensees should consider not only what was removed but also whether the resulting image accurately represents the property.



Wisconsin REALTORS® Association
4801 Forest Run Road, Suite 201
Madison, WI 53704
608-241-2047
www.wra.org

When in doubt, disclosure is a prudent practice.

6. Does changing grass, landscaping or the sky require a disclosure?

Potentially. The answer depends on what was changed and whether the alteration creates a false or misleading impression.

For example, digitally replacing a patchy lawn with lush green grass or adding landscaping that does not exist could give consumers an inaccurate impression of the property.

Replacing a cloudy sky with a sunny sky may not necessarily trigger the statutory requirement if the alteration does not change a property element or create a false or misleading impression. However, licensees should consider whether the overall alteration misrepresents the property's appearance or surroundings.

7. Does changing paint colors, flooring, countertops or other property features require a disclosure?

Yes, when the technological alteration depicts property features or improvements that do not exist and creates a false or misleading impression.

For example, using AI to show hardwood floors where the property actually has carpeting, or depicting a kitchen with new cabinets and countertops when those improvements have not been made, can mislead consumers about the property's actual features.

The advertisement should clearly disclose that the image has been digitally altered.

8. Does removing utility poles, neighboring buildings, power lines or other permanent features require a disclosure?

Yes, when removing those features creates a false or misleading impression of the property.

For example, digitally removing power lines crossing a backyard or a neighboring structure visible from the property could give consumers an inaccurate understanding of the property's surroundings.

Licensees should not assume that a feature is unimportant simply because it is located outside the property boundaries. Removing surrounding features may still create a misleading impression of the property being advertised.



Wisconsin REALTORS® Association
4801 Forest Run Road, Suite 201
Madison, WI 53704
608-241-2047
www.wra.org

9. Do routine photographic adjustments, such as brightness, cropping or correcting lens distortion, require disclosure?

Generally, no. Routine photographic adjustments that improve image quality without changing property elements or creating a false or misleading impression would not ordinarily trigger the disclosure requirement.

For example, increasing the brightness of a dark photograph so consumers can see the room more clearly generally would not require disclosure.

Similarly, cropping or correcting lens distortion to improve the composition of a photograph would not ordinarily require disclosure. However, editing that conceals significant property features or conditions or otherwise creates a misleading impression may trigger the requirement.

Compliance and Best Practices

10. What should the disclosure say?

The law does not prescribe specific disclosure language.

The disclosure should clearly communicate that the advertising has been altered or modified using technology.

Depending on the circumstances, examples might include:

- "Image Has Been Digitally Altered."
- "Virtually Staged."
- "Digitally Altered to Show Potential Renovations."
- "Rendering Depicts Possible Improvements."

Firms may develop standardized disclosure language for use in their advertising. The language should accurately describe the alteration and provide consumers with sufficient information to understand that the image does not necessarily depict the property as it currently exists.

11. Does the disclosure have to appear on every altered image?

The statute requires disclosure in the advertising but does not prescribe a specific location or format for the disclosure.



Wisconsin REALTORS® Association
4801 Forest Run Road, Suite 201
Madison, WI 53704
608-241-2047
www.wra.org

As a best practice, licensees should make disclosures clear and conspicuous so consumers can readily identify which images have been altered.

When multiple images are included in an advertisement, placing a disclosure directly on or adjacent to each altered image may help avoid confusion, particularly when images can be viewed or shared individually.

12. Who is responsible for making the disclosure?

Licensees are responsible for ensuring that their advertising complies with Wisconsin law.

This responsibility remains important when photographs, videos or other advertising materials are prepared by photographers, marketing companies or other third-party vendors.

Licensees should understand whether technology has been used to alter advertising and verify that any required disclosures are included before the advertising is published.

Firms should also consider establishing procedures for reviewing technology-enhanced advertising and communicating disclosure expectations to vendors.

13. May a real estate firm adopt disclosure requirements that go beyond what the law requires?

Yes. The 2027 Practice Changes establish minimum legal disclosure requirements. A firm may adopt policies requiring additional disclosures.

For example, a firm may require disclosure whenever an image has been virtually staged, even if the particular alteration does not independently trigger the statutory requirement.

A firm may also establish policies addressing the use of AI, image editing, virtual staging or third-party advertising vendors.

Licensees should comply with both Wisconsin law and their firm's advertising policies.

14. What is the purpose of the new disclosure requirement?

The new requirement is intended to promote transparency and help consumers understand when technology has changed how a property is represented in advertising.



Wisconsin REALTORS® Association
4801 Forest Run Road, Suite 201
Madison, WI 53704
608-241-2047
www.wra.org

Artificial intelligence and other technology can create realistic images depicting features or improvements that do not actually exist. Consumers may have difficulty distinguishing those images from photographs of the property as it currently exists.

The goal is not to prohibit the use of technology but to ensure consumers receive accurate information and are not misled by technologically altered advertising.

15. Where can licensees find more information about the 2027 Practice Changes?

The WRA's **2027 Practice Changes** resource page includes information about the new requirements, revised WB forms, frequently asked questions, videos and other educational resources.

Visit www.wra.org/practicechanges for additional information and updates.