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DEPARTMENT OF COMMERCE

National Telecommunications and Information Administration

"Initiative To Protect Youth Mental Health, Safety & Privacy Online"

To whom it may concern:

We thank you for the opportunity to provide inputs and recommendations for addressing the harms posed by social media platforms to the health and safety of young people for the Task Force on Kids Online Health & Safety. In this submission, #ShePersisted provides insights into the impacts of social media platforms on young people, calling specific attention to the role of digital platforms in facilitating adverse mental and physical health outcomes.

Major social media platforms have emerged as a pernicious influence on young people in the United States and globally. After careful examination of the impact of social media on civic participation and leadership, #ShePersisted has grown deeply concerned about the design choices of platforms which allow dangerous and unhealthy material to be pushed into the feeds of young users. A vicious intersection of profit-driven design combined with the failure to self-regulate creates unique vulnerabilities for young users. These vulnerabilities are easily exploited, particularly for teenage girls, which demands immediate attention and decisive action.

Herein, we share our recommendations for the Task Force concerning how to approach this sensitive and urgent issue.

1. Build from the existing empirical evidence and knowledge base.

The Task Force does not need to start from scratch. There is already a significant body of evidence to draw on that can guide the development of strategies for preventing and mitigating harms to young peoples' mental and physical health on digital platforms. There is an urgency to act with the information already in the public domain.

At their core, major social media platforms are operated with a primary focus on increasing user engagement through features that encourage continuous scrolling, frequent person-to-person interaction, and a pursuit of "likes" and followers, which creates an environment that can be addictive and even dangerous for young people.

By providing a never-ending stream of content, social media companies are actively encouraging their youngest users to utilize their platforms for long periods of time, and

as research indicates, [increasingly at the expense of their mental and physical health](#).

Meta [has been aware of the harm their services cause young people for years](#), particularly in exacerbating and initiating mental health issues experienced by teenage girls. Internal documents disclosed by Facebook whistleblower Frances Haugen in 2021 revealed that Instagram usage had serious impacts on teenage girls' body image, mental health, and perceptions of self, but such adverse effects were minimized by CEO Mark Zuckerberg in Congressional testimony and in related public commentary. The company has continuously failed to tackle their shortcomings in the name of generating profit - and new information confirms company leadership has gone so far as to try and [obscure evidence of their bad behavior](#). Furthermore, companies like [Google, Amazon, and Meta are funding active opposition to policy measures that seek to ensure young people's safety online](#).

2. Recognize the self-regulation of digital platforms has failed to meaningfully address social media harms.

There are ways to provide oversight to digital platforms without compromising the principles set out in Section 230. The overwhelming evidence of major social media platforms have demonstrated a clear failure to abide by their own terms of service nor have they consistently or thoroughly implemented necessary safety policies. Such failures are particularly notable when considering certain choices in the designs of platforms and how user safety is addressed.

For example, Google, Facebook, YouTube, and Instagram permit predatory marketing schemes, such as allowing the advertising and sale of unapproved and dangerous health scam products that can endanger women and girl's reproductive health, as evidenced by an investigation #ShePersisted and Fumbua conducted in [Kenya](#). These products exploit societal pressures and [gender-specific health concerns](#) for profit. The effective monetization of ads featuring scam products is made possible through design choices that push this material to users, further facilitated by inadequate data and privacy protections.

Platforms are provided a significant shield of liability by Section 230, which makes it difficult to hold them legally accountable for failing to effectively moderate activities such as [cyberbullying](#), image-based abuse, nonconsensual sexual advances, and [content promoting unhealthy perceptions of self](#). However, we must not lose sight of existing options for accountability. One approach is to focus on the design choices of platforms that fall outside the jurisdiction of Section 230. For example, we can look to a [legal challenge that is currently unfolding](#), which covers "hundreds of lawsuits filed on behalf of individual children who allegedly suffered negative physical, mental and emotional health effects from social media use including anxiety, depression, and occasionally suicide." U.S. District Judge Yvonne Gonzalez Rogers stated major social media companies may be [sued for negligence over their duty to design reasonably safe](#)

[products and to warn users of known defects.](#)” ruling against Google and YouTube parent company Alphabet, Facebook and Instagram parent company Meta, TikTok parent company ByteDance, and Snapchat parent company Snap’s efforts to have the case dismissed on the grounds of Section 230 and the U.S. Constitution’s First Amendment. Platform design choices that impact minors specifically, such as ineffective parental control mechanisms, photo filters that alter a user’s physical appearance, a lack of mechanisms for restricting time spent on platforms, not providing labels for filtered content, weak systems for age verification, ineffective reporting systems for predatory accounts, and difficulties surrounding account deletion are examples of fair territory for oversight.

The ruling in this lawsuit affirms social media platforms are in fact designed in ways that facilitate negative impacts on minors’ mental health, and once again, proves major social media companies are pushing back on efforts to safeguard the well-being of their youngest users. Building on rulings like the one described above to frame approaches to mitigating these harms allows for an opportunity to hold social media platforms accountable outside of the shadow of Section 230.

3. Examine more deeply the growing body of evidence around the impacts of social media on learning and behavior in the classroom.

[Social media use results in disrupted learning and increased peer-to-peer bullying](#), according to a report published by the American Federation of Teachers and partners in 2023. An uptick in social media usage by students has resulted in increased distraction from educational tasks, disruptions in the classroom due to device usage, and a turning to digital platforms as an additional avenue for bullying and harassing peers. The omnipresent nature of social media in many young people’s lives, and resulting exacerbations of mental and physical health issues, can also hinder students’ ability to fully engage in the classroom and even complete their education.

4. Operate with an intersectional lens in the gathering of evidence and recommendations to consider impacts on mental health and the civic participation of girls.

There is a strong concern among the expert community around how social media usage affects teenage girls’ mental health, as algorithms continuously push material (including advertisements) leading many of them to experience increased anxiety, depression, and self-harm. This year, [the U.S. Surgeon General](#) issued an advisory stating use of social media can lead to “body dissatisfaction, disordered eating behaviors, social comparison, and low self-esteem, especially among adolescent girls.” Worryingly, the advisory also identified that in a survey of 11 to 15-year-old girls, “one-third or more say they feel ‘addicted’ to a social media platform.” [Girls are ending up in hospitals because of the content they are constantly exposed to](#) on platforms like Instagram and TikTok, whose algorithms [actively promote dangerous content around eating and body image, as well](#)

[as suicide and self-harm](#), the result of a grave disregard social media companies have for the very real suffering their platforms are causing.

Furthermore, evidence shows that young people report being targeted by cyberbullying due to their [race](#) or being part of the [LGBTQIA+ community](#), and may face intersectional discrimination based on overlapping facets of their identity. For example, researcher Alexandria Onuoha notes gendered and racialized online abuse has [“life threatening repercussions for Black women and girls.” and especially for LGBTQIA+ Black women and girls.](#)

5. Consider the long-term impact of girls’ limited civic participation.

Beyond the immediate impacts, it must be recognized that the online environment has important consequences for girls’ future political and civic participation. As previously noted, there exists a proliferation of material on social media platforms perpetuating harmful gender norms, which shape societal attitudes around how women should look and behave. Impacts on self-image and confidence can cause a chilling effect, pushing teenage girls to silence themselves and minimize their presence, or to feel their voice does not matter. [Our modern social media ecosystems are flooded with gendered disinformation and abuse towards women in positions of leadership.](#) Exposure to such content can make girls self-censor and disengage from the public sphere, as a fear of facing public scrutiny or being the target of slanderous, harassing, and abusive messages can deter them from pursuing leadership roles or engaging in political discourse. Girls who observe the gender-based abuse rampant on social media platforms may ultimately determine the political arena is unwelcoming or even too dangerous to engage in. In the U.S., [women currently represent only](#) 25% of the Senate, 28.7% of the House of Representatives, 24% of gubernatorial seats, and 32.7% of State Legislature seats. As of June 2023, the Council on Foreign Relations ranks the U.S. [75th in the world for political parity.](#) Women’s representation in politics is clearly already deficient, and will be made worse if the implications of social media-facilitated harms for girls’ political and civic participation go unaddressed. We risk tarnishing our image as a nation that promotes equality and democratic values in the global arena.

6. Look deeper into how platforms amplify and create an audience for misogynistic extremism, to the detriment of society as a whole.

The designs of digital platforms aren’t only harmful for women and girls, but society as a whole. Because platform designs have proven to facilitate addictive interaction, young boys may be increasingly exposed to extremist and misogynistic content, such as that created and circulated by what online extremism researchers refer to as the “manosphere.” The manosphere is a term encompassing multiple communities online including men’s rights activists, incels, and “red pillers,” and its most popular influencers create content underpinned by sexist views of women and toxic conceptions of masculinity, often shared under the guise of championing men’s self-improvement,

empowering them, and providing relationship advice. Such content has received millions of views across platforms, and can serve as a normalizing force for sexism against girls and women, and [even as justification for violence targeting women in the public eye](#). Platform algorithms [actively suggest this content to boys and young men](#), which serves the interests of manosphere influencers seeking to lure in vulnerable males to view and interact with their posts. The more they spend time on platforms and interact with this content, what they are suggested may become more extreme.

In a [2023 report](#), Ekō researchers highlighted that after setting up fake accounts with a registered age of thirteen-years-old on TikTok, the “algorithm served up highly misogynistic content that amplified hateful messages and rhetoric suggesting ‘women are evil’ and that ‘modern women are cowards,’” and “pushed grim commentary around isolation, loneliness, and failed relationships that seem to target young men and boys.” This can have a [radicalizing impact](#) on a demographic who is in the early stage of developing their sense of identity, shaping beliefs around girls and women and their place in society early on, and can encourage harassing and violent behavior. It is essential to understand the broader implications of this kind of content, and how certain design choices allow young people continued access to it through features that fuel addiction and increased usage as the Task Force begins its work.

According the [Australian government](#), a leader in the field of online safety, “recent research has found that 25 per cent of teenage boys in Australia look up to social media personalities who perpetuate harmful gender stereotypes and condone violence against women”; we don’t believe the situation to be any better in the U.S., although this problem too often goes unreported.

7. Establish online safety standards.

There are several measures that should be considered to incentivize social media companies to take action, such as establishing robust online safety standards that take into account the harmful impacts platforms’ design features have on young people. Given the recent ruling made by Judge Gonzalez Rogers, there are indeed aspects of platform design that can be addressed through legislation. We have been shown repeatedly that social media companies will continue to prioritize profit over self-regulation, and it is past time to use the tools we have available to their fullest extent. Federal law should also build on efforts like California’s Age Appropriate Design Code Bill, or the [UK Online Safety Bill](#) (now passed), which include measures mandating companies comply in areas concerning minors’ data privacy, designs that impact minors’ well-being, enforcement of terms and conditions, and [more](#). Despite being temporarily blocked in September 2023, California Attorney General Rob Bonta has moved to appeal the decision, and with the AADC having received substantial bipartisan support, other states can build on its momentum and look to the proposed legislation to shape their own policies.

It is crucial decision-makers urge increased transparency around ensuring minor safety, and should require companies make clear their efforts to address harms facing young people on their platforms through risk assessments. Efforts in other jurisdictions, like the European Union's Digital Services Act and the U.K.'s Online Safety Act, have clear-cut provisions for holding digital platforms responsible for safeguarding minors' safety, including those which mandate risk assessments, more robust age verification measures, the changing of design features that pose harm, and the tackling of inappropriate and illegal content.

The United States risks our global standing by trailing behind such efforts, which demonstrate that the task of incentivizing platforms to prioritize user safety is not as difficult as it may seem. By failing to effectively protect minors on digital platforms, the U.S. loses an opportunity to lead the charge as a defender of young peoples' rights and democratic values.

8. Leverage existing mechanisms of oversight.

Frequent audits of companies' performance as related to the safeguarding of young peoples' safety on their platforms are also recommended to ensure consistent enforcement. The Federal Trade Commission already achieved significant successes against [the gaming industry](#) around privacy concerns and unwanted charges involving young people. Building on this progress as inspiration, we now call on the Task Force on Kids Online Health & Safety to address online harms perpetrated by social media platforms and, in collaboration with the [White House Task Force to Address Online Harassment and Abuse](#), to address this issue urgently through actions that have already been identified by the White House Task Force, including providing support to survivors and holding major social media platforms accountable through legal reform and strategic litigation for the the harmful effects on young people caused by their products.

We would be happy to share with you further details of our research on this topic, as well as a more in-detail presentation of the strategies proposed.

The future of young people's participation in our democracy and their well-being depends on it.

Best regards,

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