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Response NTIA–2023–0008 Initiative To Protect Youth Mental Health, Safety & Privacy Online

Submitted Electronically

To Whom It May Concern:

The American Psychological Association Services, Inc. (APA Services) and the American Foundation for Suicide Prevention (AFSP) respectfully submit the following response to your Request for Information comments regarding best practices and Protecting Kids Online. APA Services is the companion organization of the American Psychological Association, which is the nation's largest scientific and professional nonprofit organization representing the discipline and profession of psychology, as well as over 146,000 members and affiliates who are clinicians, researchers, educators, consultants, and students in psychological science. AFSP is the nation's leading non-profit organization dedicated to saving lives and bringing hope to those affected by suicide, including those who have experienced a loss, with volunteer chapters in all 50 states, D.C., and Puerto Rico. The largest single provider of private funding for suicide prevention research in the United States, AFSP also provides those affected by suicide with a nationwide community empowered by research, education, and advocacy to take action to end suicide.

Helping ensure that technology shapes the future for the better requires understanding the psychology of human-technology interaction. Just as new technological tools are emerging, the psychological science on human interaction with new products and services is also developing. A burgeoning area of psychological science involves the development, use, and impact of digital health technologies.

Today, we are seeing the repercussions of our underinvestment and lack of focus on children's mental health. Depression rates for teens doubled between 2009 and 2019 and suicide is the second leading cause of death for U.S. youth, up 4% since 2020, with one in five teens considering suicide during the pandemic and eating disorder emergency room admissions for girls 12 to 17 years old doubling since 2019¹. Furthermore, since the start of the pandemic, over

¹Radhakrishnan, L. (2022). Pediatric Emergency Department Visits Associated with Mental Health Conditions Before and During the COVID-19 Pandemic — United States, January 2019–January 2022. *MMWR. Morbidity and Mortality Weekly Report*, 71(8). <https://doi.org/10.15585/mmwr.mm7108e2>; Curtin, S. (2022). Vital Statistics Rapid Release Provisional Numbers and Rates of Suicide by Month and Demographic Characteristics: United States, 2021. <https://www.cdc.gov/nchs/data/vsrr/vsrr024.pdf>; Daly, M. (2021). Prevalence of Depression Among Adolescents in the U.S. From 2009 to 2019: Analysis of Trends by Sex, Race/Ethnicity, and Income. *Journal of Adolescent Health*.



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167,000 children have lost a parent or caregiver to the virus ². This kind of profound loss can have significant impacts on the mental health of children, leading to anxiety, depression, trauma, and stress-related conditions ³. Faced with such data, in December 2021, the U.S. Surgeon General issued an advisory calling for a unified national response to the mental health challenges young people are facing ⁴. The rarity of such advisories further underscores the need for action to help stem the mental health crisis of children and adolescents.

There are many reasons why youth are experiencing this crisis today, and it is likely that there are multiple contributors to the current status. Below, we outline emerging research with findings that have begun to suggest possible benefits, as well as possible adverse effects of technology and social media use on adolescent development. Before we discuss specific impacts of online platforms or solutions, it is important to acknowledge that causal data are not available for many of these issues, since the experimental designs needed to make cause-and-effect statements would be considered unethical or require access to currently inaccessible data. This underscores the need for increased access to data and funding for high-quality research. However, as with non-causal research revealing the effects of childhood adversity on mental health, or the effects of combat on PTSD among veterans, extant, rigorous science can nevertheless allow us to reach reasonable conclusions that can shape policy.

It also is important to acknowledge that technology and social media may not, in themselves, be problematic for child development, as each device and platform offers a multitude of features and communication opportunities that users can choose from. Extensive research has demonstrated that the amount of screentime alone is not likely associated with negative psychological outcomes among youth ⁵. Moreover, not all youth exposed to identical stimuli are affected in the same ways. Thus, the most appropriate question is: what specific online *behaviors, features, or content* may be associated with benefit or risk to which youth. This is the focus of the most recent work among scientists, yielding some comforting, but also some worrying results.

<https://doi.org/10.1016/j.jadohealth.2021.08.026>; Suicide. (n.d.). National Institute of Mental Health (NIMH). Retrieved February 10, 2023, from

[https://www.nimh.nih.gov/health/statistics/suicide/#%3A~%3Atext%3DSuicide%20is%20a%20Leading%20Cause%20of%20De](https://www.nimh.nih.gov/health/statistics/suicide/#%3A~%3Atext%3DSuicide%20is%20a%20Leading%20Cause%20of%20Death%20in%20the%20United%20States%2C-)

[ath%20in%20the%20United%20States%2C-According%20to%20the%26text%3DSuicide%20was%20the%20second%20leading%20Cause%20of%2035%20and%2044;](https://www.nimh.nih.gov/health/statistics/suicide/#%3A~%3Atext%3DSuicide%20is%20a%20Leading%20Cause%20of%20Death%20in%20the%20United%20States%2C-According%20to%20the%26text%3DSuicide%20was%20the%20second%20leading%20Cause%20of%2035%20and%2044;)

Yard, E. (2021). Emergency Department Visits for Suspected Suicide Attempts Among Persons Aged 12–25 Years Before and During the COVID-19 Pandemic — United States, January 2019–May 2021. *MMWR. Morbidity and Mortality Weekly Report*, 70(70(24);888–894). <https://doi.org/10.15585/mmwr.mm7024e1>.

² Hidden Pain: Children Who Lost a Parent or Caregiver to COVID-19 and What the Nation Can Do To Help Them | COVID Collaborative. (n.d.). www.covidcollaborative.us. <https://www.covidcollaborative.us/initiatives/hidden-pain>.

³ Almeida, I. L. L., Rego, J. F., Teixeira, A. C. G., & Moreira, M. R. (2021). Social isolation and its impact on child and adolescent development: a systematic review. *Revista paulista de pediatria : orgao oficial da Sociedade de Pediatria de Sao Paulo*, 40, e2020385. <https://doi.org/10.1590/1984-0462/2022/40/2020385>.

⁴ Richtel, M. (2021, December 7). Surgeon General Warns of Youth Mental Health Crisis. *The New York Times*. <https://www.nytimes.com/2021/12/07/science/pandemic-adolescents-depression-anxiety.html#:~:text=The%20United%20States%20surgeon%20general>.

⁵ Odgers CL, Jensen MR. Annual Research Review: Adolescent mental health in the digital age: facts, fears, and future directions. *J Child Psychol Psychiatry*. 2020;61(3):336–348. doi:10.1111/jcpp.13190.



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Our brains, our bodies, and our society have been evolving together to shape human development for millennia, influencing our communities, our culture, and our society. Within the last twenty years, the advent of portable technology and social media platforms is changing what took 60,000 years to evolve. We are just beginning to understand how this may impact youth development.

Children's interactions with peers are not merely for fun. It is within the social context that most children's education occurs; thus, peer interactions significantly affect cognitive development. The peer context also is the milieu in which children learn social rules, norms, and expectations; develop emotional competence and morality; and in which all of children's behaviors are consistently reinforced (or corrected), thus influencing long-term behavioral development. Indeed, numerous studies have revealed that children's interactions with peers have enduring effects on their occupational status, salary, relationship success, emotional development, mental health, and even on physical health and mortality over 40 years later ⁶. These effects are stronger than the effects of children's IQ, socioeconomic status, and educational attainment. These enduring effects likely occur because of remarkably powerful and reciprocal interactions between youths' social experiences and their biological development. Children's brains and peripheral nervous systems influence how they interact with peers, and in turn, those experiences change the development of their brain structures, neural pathways, and even how their nervous system responds to stress throughout their lives.

There is reason to be significantly concerned about the age at which many youth begin using technology and social media. Developmental neuroscientists have revealed that there are two highly critical periods for adaptive neural development. Aberrations in our brain growth during these periods may have lifetime implications. One of these is the first year of life. The second begins at the outset of puberty and lasts until early adulthood (i.e., from approximately 10 to 25 years old). This latter period is highly relevant, as this is when a great number of youths are offered relatively unfettered access to devices and unrestricted or unsupervised use of social media and other online platforms ⁷. Within the age range of 10-25 years, change occurs gradually and steadily; thus risks likely are greater towards the beginning of this range and become attenuated as youth mature. Herein, this period is referred to as "pre-adulthood."

At the outset of puberty, adolescents' brains begin developing in a specific, pre-determined sequence. Generally, sub-cortical areas shared with many mammalian species mature before areas at the top layer of the brain, which is responsible for many of our more human capabilities, such as premeditation, reflection, and inhibition. Among these initial areas developing among most youth, typically starting at the ages of 10-12 years old, are regions associated with our craving for "social rewards," such as visibility, attention, and positive feedback from peers. In contrast, regions involved in our ability to inhibit our behavior, and resist temptations (i.e., the prefrontal cortex) do not fully develop until early adulthood (i.e., approximately 10-15 years

⁶ For a review, see; Prinstein, M. J., & Giletta, M. (2020). Future Directions in Peer Relations Research. *Journal of Clinical Child & Adolescent Psychology*, 49(4), 556–572. <https://doi.org/10.1080/15374416.2020.1756299>.

⁷ Vogels, E. A., Gelles-Watnick, R., & Massarat, N. (2022, August 10). Teens, social media and technology 2022. Pew Research Center. <https://www.pewresearch.org/internet/2022/08/10/teens-social-media-and-technology-2022/>.



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later). In other words, when it comes to youths' cravings for social attention, they are "all gas pedal with no brakes." Adolescence is thus a developmentally vulnerable period during which youth may be especially motivated to pursue social rewards, and not yet fully capable of restraining themselves.

Research suggests that technology and social media use may exploit this biological vulnerability among youth. Data reveal that social media stimuli, such as receiving "likes" or followers activates the social reward regions of the brain⁸. In other words, these features of social media capitalize on youths' biologically based need for social rewards before they are able to regulate themselves from over-use. This has several significant implications for youth mental health.

Current and Emerging Health Risks

Although further research is necessary to determine the extent of impact and assess possible solutions, social media use by youth and young adults has been associated with negative mental health impacts.

Features like auto-play and endless-scroll create a perpetual loop of content, feeding children and young adults the same type of videos, images, and text continuously. Content disseminated to youth through these features often involves weight loss, eating disorder content, and even instructions for suicide. The nature of this content, and the manner in which it is received by young users, can create a perfect storm of potential harm.

Social media use has been linked to negative self-image among teens and young adults.⁹ Numerous studies indicate that there is a significant relationship between children and young adults using social media and struggles with body image and eating disorders.¹⁰ Being constantly exposed to content that romanticizes and glorifies certain lifestyles, young users can fall into self-comparison traps which can negatively impact their confidence.

Research shows that many adolescents report that social media makes them feel worse about themselves, and most acknowledge that they spend too much time in front of screens.¹¹ Furthermore, youth who are coming of age in the digital world today are having to navigate influences that their predecessors did not, during periods of key brain development – specifically from the ages of 10 to 25. The greater risks to their brain development, based on what content they consume, occur during the beginning of this period.

⁸ Sherman, L. E., Hernandez, L. M., Greenfield, P. M., & Dapretto, M. (2018). What the brain 'Likes': neural correlates of providing feedback on social media. *Social cognitive and affective neuroscience*, 13(7), 699–707. <https://doi.org/10.1093/scan/nsy051>.

⁹ Thai, H., Davis, C. G., Mahboob, W., Perry, S., Adams, A., & Goldfield, G. S. (2023). Reducing social media use improves appearance and weight esteem in youth with emotional distress. *Psychology of Popular Media*. Advance online publication. <https://doi.org/10.1037/ppm0000460>

¹⁰ Holland, G., & Tiggeman, M. (2016). A systematic review of the impact of the use of social networking sites on body image and disordered eating outcomes. *Body Image*, 17(17), 100–110. <https://doi.org/10.1016/j.bodyim.2016.02.008>

¹¹ Bickham, D.S., Hunt, E., Bediou, B., & Rich, M. (2022). Adolescent Media Use: Attitudes, Effects, and Online Experiences. Boston, MA: Boston Children's Hospital Digital Wellness Lab. <https://digitalwellnesslab.org>



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Social Media and Loneliness. Although ostensibly social media platforms are built to foster interpersonal contacts and connections, they are not designed primarily to foster meaningful and mutually rewarding relationships that confer psychological benefits. Relationships are most beneficial to youths' psychological development when they are characterized by support, emotional intimacy, disclosure, positive regard, reliable alliance (e.g., "having each other's backs"), and trust¹². It is possible to use social media to foster exactly these types of relationship qualities, such as through direct messaging features. However, these are not the functions that are highlighted on most platforms. More typically, users are directed towards the number of "likes," followers, or reposts they received, often without immediate access to the identity of those who engaged with their profile or content. In other words, platforms are more apt to motivate users towards one's metrics than people themselves, which has led many youth to upload curated or filtered content to portray themselves most favorably. Note that these features of social media, and the resulting behaviors of those who use social media create the exact opposite qualities needed for successful and adaptive relationships (i.e., disingenuous, anonymous, depersonalized). In other words, social media offers the "empty calories of social interaction," that appear to help satiate our biological and psychological needs, but do not contain any of the healthy ingredients necessary to reap benefits. Anecdotally, teens' behavior reflects this issue – the "Finsta" phenomenon reflects digital natives' attempt to find more honest and intimate relationships with one another, but without experience in doing so first offline. Scientific data also support this claim; research reveals that in the hours following social media use, teens paradoxically report *increases* rather than decreases in loneliness¹³.

Heightened Risk for Negative Peer Influence. Adolescents frequently are exposed to content online depicting illegal, immoral, dangerous, and unethical behavior. The architecture of many social media platforms allows users to like, repost, or comment on this content. Emerging data suggest that these features of social media present a significant risk to adolescents' mental health. Specifically, data reveal that social media may change adolescents' susceptibility to maladaptive behavior through both biological and psychological pathways. Research examining adolescents' brains while on a simulated social media site, for example, revealed that when exposed to illegal, dangerous imagery, activation of the prefrontal cortex was observed suggesting healthy inhibition towards maladaptive behaviors. However, when these same images were shown with icons indicating that they were "liked" on social media, there was a significant decrease in activation of the brain's inhibition center, suggesting that the "likes" may reduce youths' inhibition (i.e., perhaps increasing their proclivity) towards dangerous and illegal

¹² Furman, W., Bukowski, W. M., Newcomb, A. F., & Hartup, W. W. (1996). The company they keep: Friendship in childhood and adolescence. Cambridge studies in social and emotional development. In W. Bukowski, A. Newcomb & W. Hartup (Eds), *The measurement of friendship perceptions: Conceptual and methodological*, (41-65).

¹³ Armstrong-Carter, E., Garrett, S. L., Nick, E. A., Prinstein, M. J., & Telzer, E. H. (2022). Momentary links between adolescents' social media use and social experiences and motivations: Individual differences by peer susceptibility. *Developmental Psychology*. Advance online publication. <https://doi.org/10.1037/dev0001503>.



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behavior.¹⁴ This is evidence that social media features are changing how youths' brains respond to images in ways that confer risk for the development of maladaptive behavior.

There also is evidence that these features of social media may promote a psychological affinity for dangerous and risk-taking behavior. For instance, a study of young high school students revealed that adolescents' exposure to "liked" posts depicting alcohol use was associated with changes in teens' perceptions of their peers' acceptance of alcohol use, which in turn predicted these same teens' early engagement in heavy episodic drinking (i.e., five or more drinks on a single occasion)¹⁵. Related research has demonstrated that individuals are more likely to "like" a post that they see others have "liked" before them, and this may increase the likelihood of exposure to similarly themed-posts, via AI-derived algorithms¹⁶. These findings illustrate clear and powerful ways that the features embedded in social media platforms may have an important and highly concerning effect on youth mental health. Note, it is also possible that these same processes can be used to influence peers towards positive behaviors; however, this has not been adequately investigated.

Risks for Addictive Social Media Use. Youths' biological vulnerabilities also have significant implications for "problematic social media use" or addictive behaviors; note that the regions of the brain activated by social media use overlap considerably with the regions involved in addictions to illegal and dangerous substances¹⁷. As noted above, the developing brain is built to increase a desire for social rewards (that social media delivers abundantly), without the ability to show the capacities of inhibition and restraint capable among adults. This suggests that youth may be at risk for extraordinarily frequent uses of social media. Several bodies of research reveal that this indeed may be a very significant concern. For instance, data suggest that almost half of all adolescents report that they use social media "almost constantly"¹⁸. Research also has compared social media use to diagnostic criteria for substance use dependencies, revealing that many adolescents report an inability to stop using social media, even when they want to, remarkable efforts to maintain access to social media, the use of social media to regulate their emotions, a need for increasing social media use to achieve the same level of pleasure (i.e., tolerance symptoms), withdrawal symptoms following abstinence, a significant impairment in their daily educational, social, work routines. A recent study revealed that over 54% of 11– 13-

¹⁴ See for example, Sherman, L. E., Hernandez, L. M., Greenfield, P. M., & Dapretto, M. (2018). What the brain 'Likes': neural correlates of providing feedback on social media. *Social cognitive and affective neuroscience*, 13(7), 699–707. <https://doi.org/10.1093/scan/nsy051>.

¹⁵ Nesi J, Rothenberg WA, Hussong AM, Jackson KM. Friends' Alcohol-Related Social Networking Site Activity Predicts Escalations in Adolescent Drinking: Mediation by Peer Norms. *J Adolesc Health*. 2017;60(6):641-647. doi:10.1016/j.jadohealth.2017.01.009.

¹⁶ Egebark J, Ekström M. Liking what others "Like": using Facebook to identify determinants of conformity. *Exp Econ*. 2017;21(4):1-22. doi:10.1007/s10683-017-9552-1.

¹⁷ De-Sola Gutiérrez, J., Rodríguez de Fonseca, F., & Rubio, G. (2016). Cell-Phone Addiction: A Review. *Frontiers in Psychiatry*, 7(175). <https://doi.org/10.3389/fpsy.2016.00175>; Griffiths, M. D., Kuss, D. J., & Demetrovics, Z. (2014). Social networking addiction: An overview of preliminary findings. In K. P. Rosenberg & L. Curtiss Feder (Eds.), *Behavioral addictions: Criteria, evidence, and treatment* (pp. 119–141). Elsevier Academic Press. <https://doi.org/10.1016/B978-0-12-407724-9.00006-9>; Kirby, B., Daport, A., Ash, C., Malley, K., & West, R. (2020). Smartphone pathology, agency and reward processing. *Lecture Notes in Information Systems and Organisation*, 321-329. https://doi.org/10.1007/978-3-030-60073-0_37.

¹⁸ Vogels, E. A., Gelles-Watnick, R., & Massarat, N. (2022, August 10). Teens, social media and technology 2022. Pew Research Center. <https://www.pewresearch.org/internet/2022/08/10/teens-social-media-and-technology-2022/>.



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year-old youth reported at least one of these symptoms of problematic social media use¹⁹. About 85% of youth report spending more time than intended online and 61% reporting failing when trying to stop or reduce their use of social media²⁰.

Alterations in Brain Development. Youths' biological vulnerability to technology and social media, and their resulting frequent use of these platforms, also have the potential to alter youths' neural development since our brains develop in response to the environment we live in. Recent studies have revealed that technology and social media use is associated with changes in structural brain development (i.e., changing the size and physical characteristics of the brain). Recent data has revealed that youth indeed spend a remarkable amount of time using their devices²¹. Objective data measured by teens' phones themselves indicated that the average number of times that youth in sixth grade picked up their phones was over 100, with some interrupting daily activities to pick up their phones over 400 times a day. On average, adolescents also reported an average of 8.2 hours of time on their devices each day, with some logging double this amount²². The phone "apps" adolescents picked up their devices to use most often were popular social media platforms. Our research using annual fMRI brain scans revealed that more frequent uses of adolescents' devices (i.e., predominantly for social media) was associated with changes in how their brains developed. More phone "pickups" were associated with unique development of brain regions. In short, results found that high social media users may have promoted brain development in a way that may make adolescents more inclined to focus on social rewards (e.g., attention from peers) and altered self-control²³.

Youth's Exposure to Unmonitored Content Poses Potential Risks. There are two domains of problematic content online to which many youth are exposed. Research demonstrates that this also likely contributes to mental health difficulties among children and adolescents. One domain pertains to content that actively showcases and promotes engagement in psychologically disordered behavior, such as sites that discuss eating disordered behaviors (i.e., "pro-Anna" sites that encourage fasting, laxative use, excessive exercise) and pro-cutting sites depicting nonsuicidal self-injury²⁴. Research indicates that this content has proliferated on social media sites, not only depicting these behaviors, but teaching young people how to engage in each, how to conceal these behaviors from adults, actively encouraging users to engage in these behaviors, and socially sanctioning those who express a desire for less risky behavior²⁵. Moreover, in some

¹⁹ Boer M, Stevens GWJM, Finkenauer C, van den Eijnden RJM. The course of problematic social media use in young adolescents: A latent class growth analysis. *Child Dev.* 2022;93(2):e168-e187. doi:10.1111/cdev.13712

²⁰ The Common Sense Census: Media Use by Tweens and Teens. (2021).

https://www.commonsensemedia.org/sites/default/files/research/report/8-18-census-integrated-report-final-web_0.pdf.

²¹ Armstrong-Carter, E., Garrett, S. L., Nick, E. A., Prinstein, M. J., & Telzer, E. H. (2022). Momentary links between adolescents' social media use and social experiences and motivations: Individual differences by peer susceptibility. *Developmental psychology*.

²² Maza MT, Fox KA, Kwon S-J, et al. Association of habitual checking behaviors on social media with longitudinal functional brain development. *JAMA Pediatr.* 2023;177(2):160-167. doi:10.1001/jamapediatrics.2022.4924.

²³ See above.

²⁴ Lewis, S. P., Heath, N. L., St Denis, J. M., & Noble, R. (2011). The scope of nonsuicidal self-injury on YouTube. *Pediatrics*, 127(3), e552-e557. <https://doi.org/10.1542/peds.2010-2317>.

²⁵ Whitlock JL, Powers JL, Eckenrode J. The virtual cutting edge: the internet and adolescent self-injury. *Dev Psychol.* 2006 May;42(3):407-17. doi: 10.1037/0012-1649.42.3.407. PMID: 16756433.



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cases this content is not removed nor are trigger warnings included to protect vulnerable youth from the effects that exposure to this content can have on their own behavior. This underscores the need for platforms to deploy tools to filter content, display warnings, and create reporting structures to mitigate these harms.

A second area of concern regarding online content pertains to the frequency of online discrimination and cyberbullying, including youths' posts that encourage their peers to attempt suicide. Research demonstrates that online victimization, harassment, and discrimination against racial, ethnic, gender, and sexual minorities is frequent online and often targeted at young people²⁶. LGBTQ+ youth experience a heightened level of bullying, threats, and self-harm on social media. One in three young LGBTQ+ people have said that they had been sexually harassed online, four times as often as other young people²⁷. Brain scans of adults and youths reveal that online harassment activates the same regions of the brain that respond to physical pain and trigger a cascade of reactions that replicate physical assault and create physical and mental health damage²⁸. Moreover, research has revealed that online discrimination often is harsher and more severe than offline discriminatory experiences. Results reveal that the effects of online discrimination and bullying on youths' risk for depression and anxiety are significant above and beyond the effects of experiences that these same youth experience offline. The permanence, potential for worldwide dissemination, anonymity, and the like, repost, and comment features afforded on most social media platforms seem to contribute to youths' mental health difficulties. As with other forms of harassment and associated harms, new policies and processes are needed to blunt the impact of these harms.

The Potential Effects of Digital Stress. Social media platforms frequently include a variety of features designed to maintain users' engagement online, or encourage users to return to the app. Psychological theory and research have begun to reveal that this has become a significant source of stress. This is highly relevant since stress is one of the strongest predictors of children's and adolescents' mental health difficulties, including suicidal behavior. "Digital stress," is characterized by a youth's a) connection overload (i.e., notification and implicit social requirements to participate on social media platforms), b) the fear of missing out on conversations and other social interactions taking place exclusively online, c) the need to remain constantly available to others online, and d) approval anxiety (i.e., concerns about the response to one's own posts) are each notable factors influencing the way youth think about their connection to online platforms²⁹. Nearly half of all young people participating in online platforms report

²⁶ Moreno, M. A., Chassiakos, Y. R., Cross, C., Hill, D., Ameenuddin, N., Radesky, J., Hutchinson, J., Boyd, R., Mendelson, R., Smith, J., Swanson, W. S., & Media, C. C. (2016). Media use in school-aged children and adolescents. *Pediatrics*, 138(5). <https://doi.org/10.1542/peds.2016-2592>; Tynes, B. M., Giang, M. T., Williams, D. R., & Thompson, G. N. (2008). Online racial discrimination and psychological adjustment among adolescents. *Journal of Adolescent Health*, 43(6), 565-569. <https://doi.org/10.1016/j.jadohealth.2008.08.021>.

²⁷ Out Online: The Experiences of LGBT Youth on the Internet. (2013). GLSEN. <https://www.glsen.org/news/out-online-experiences-lgbt-youth-internet>.

²⁸ Cannon, D. S., Tiffany, S. T., Coon, H., Scholand, M. B., McMahon, W. M., & Leppert, M. F. (2007). The PHQ-9 as a brief assessment of lifetime major depression. *Psychological Assessment*, 19(2), 247-251. <https://doi.org/10.1037/1040-3590.19.2.247>.

²⁹ Steele, R. G., Hall, J. A., & Christofferson, J. L. (2020). Conceptualizing Digital Stress in Adolescents and Young Adults: Toward the Development of an Empirically Based Model. *Clinical child and family psychology review*, 23(1), 15-26. <https://doi.org/10.1007/s10567-019-00300-5>.



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experiencing digital stress. Research demonstrates that higher levels of digital stress are associated with greater increases in depressive symptoms among adolescents ³⁰.

Social Media Encourages Social Comparisons. The quantitative nature of social media, combined with the use of visual stimuli, creates a fertile ground for social comparisons. Adolescence, a period defined by psychologists as a process of identity development via reflected appraisal processes (i.e., evaluating oneself based on feedback from peers) are especially likely to engage with social media in ways that allow them to compare their appearance, friends, social activities with others with what they see online, especially when those in their own social network are commenting and “liking” these same posts. The opportunity for constant feedback, commentary, quantitative metrics of approval, and 24-hour social engagement is unprecedented among our species. Research suggests that these social comparison processes, and youths’ tendency to seek positive feedback or status (i.e., more “likes,” followers, online praise) is associated with a risk for depressive symptoms ³¹. In addition, psychological science demonstrates that exposure to this online content is associated with lower self-image and distorted body perceptions among young people. This exposure creates strong risk factors for eating disorders, unhealthy weight-management behaviors, and depression ³². As with other impacts of online platforms, evidence indicates that these body image issues are particularly prevalent in LGBTQ+ youth. Leaving these youth more predisposed to eating disorders, depression, bullying, substance abuse and other mental health harms.

Social Media Can Impact Sleep. The prevalence of smartphones and social media can also lead to a lack of sleep among youth during critical periods of brain development, which can have detrimental effects on healthy development and on suicide risk among youth. This is an upstream conduit to suicide risk, and research indicates that lack of sleep can be a standalone risk factor for suicide ³³. Technology use before sleep can impact the quality and length of sleep, further impacting mental and physical health negatively. ³⁴ Research has supported the link between technology use and sleep in several ways. Perhaps most compelling are data from meta-analyses

³⁰ Nick, E. A., Kilic, Z., Nesi, J., Telzer, E. H., Lindquist, K. A., & Prinstein, M. J. (2022). Adolescent Digital Stress: Frequencies, Correlates, and Longitudinal Association With Depressive Symptoms. *The Journal of adolescent health : official publication of the Society for Adolescent Medicine*, 70(2), 336–339. <https://doi.org/10.1016/j.jadohealth.2021.08.025>.

³¹ Choukas-Bradley, S., Nesi, J., Widman, L., & Galla, B. M. (2020). The Appearance-Related Social Media Consciousness Scale: Development and validation with adolescents. *Body Image*, 33, 164–174. <https://doi.org/10.1016/j.bodyim.2020.02.017>; Hawes, T., Zimmer-Gembeck, M. J., & Campbell, S. M. (2020). Unique associations of social media use and online appearance preoccupation with depression, anxiety, and appearance rejection sensitivity. *Body Image*, 33, 66–76. <https://doi.org/10.1016/j.bodyim.2020.02.010>; Nesi, J.L., & Prinstein, M.J. (2015). Using social media for social comparison and feedback seeking: Gender and popularity moderate associations with depressive symptoms. *Journal of Abnormal Child Psychology*, 43(8), 1427–1438.

³² Carrotte, E. R., Vella, A. M., & Lim, M. S. (2015). Predictors of “liking” three types of health and fitness-related content on social media: A cross-sectional study. *Journal of Medical Internet Research*, 17(8), e205. <https://doi.org/10.2196/jmir.4803>; <https://doi.org/10.1016/j.paid.2011.11.011>.

³³ Harris, L.M., Huang, X., Linthicum, K.P. *et al.* Sleep disturbances as risk factors for suicidal thoughts and behaviours: a meta-analysis of longitudinal studies. *Sci Rep* **10**, 13888 (2020). <https://doi.org/10.1038/s41598-020-70866-6>

³⁴ Paruthi S, Brooks LJ, D'Ambrosio C, Hall WA, Kotagal S, Lloyd RM, Malow BA, Maski K, Nichols C, Quan SF, Rosen CL, Troester MM, Wise MS. Recommended amount of sleep for pediatric populations: a consensus statement of the American Academy of Sleep Medicine. *J Clin Sleep Med* 2016;12(6):785–786.



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(i.e., a statistical integration of findings from across an entire body of research) indicating that 60% of adolescents report using technology in the hour before bedtime, and more screen time is associated with poorer sleep health and failure to meet sleep duration requirements set by the American Academy of Sleep Medicine, partly due to delayed melatonin release, delayed bedtimes, and increases in overstimulation and difficulty disengaging from online social interactions. Interventions to reduce nighttime screen use are successful in increasing sleep duration³⁵.

This has critical implications for adolescent development. Research suggests that insufficient sleep is associated with poor school performance, difficulties with attention, stress regulation, and increased risk for automobile accidents. Neuroscientific research has demonstrated that inconsistent sleep schedules are associated with changes in structural brain development in adolescent years. In other words, youths' preoccupation with technology and social media may deleteriously affect the size of their brains³⁶.

In addition, note that youth also engage with online and social media apps *while participating* in other activities. Indeed, early studies show that when youth are engaging in schoolwork, they often are doing so alongside the use of social media platforms, a phenomenon called “media multitasking”³⁷. Research clearly demonstrates that most humans cannot multitask, but rather are rapidly task-shifting – a process associated with poorer memory and comprehension among youth³⁸. Evidence shows that these phenomena only worsen with heavier use of social media, with more common symptoms such as mind wandering and higher levels of impulsivity among young adults who use social media more frequently³⁹.

Potential Benefits on Health, Safety, and Privacy

While it has been established that social media use can expose children and young adults to harmful mental health impacts, social media can also provide connectivity and a sense of community to adolescents across the globe. Fostering strong relationships and social connectivity

³⁵ Telzer EH, Goldenberg D, Fuligni AJ, Lieberman MD, Gálvan A. Sleep variability in adolescence is associated with altered brain development. *Dev Cogn Neurosci*. 2015;14:16-22. doi:10.1016/j.dcn.2015.05.007.

³⁶ Achterberg M, Becht A, van der Cruisen R, et al. Longitudinal associations between social media use, mental well-being and structural brain development across adolescence. *Dev Cogn Neurosci*. 2022;54:101088. doi:10.1016/j.dcn.2022.101088.

³⁷ Jeong, S.-H., & Hwang, Y. (2012). Does Multitasking Increase or Decrease Persuasion? Effects of Multitasking on Comprehension and Counterarguing. *Journal of Communication*, 62(4), 571–587. <https://doi.org/10.1111/j.1460-2466.2012.01659.x>; van der Schuur, W. A., Baumgartner, S. E., Sumter, S. R., & Valkenburg, P. M. (2015). The consequences of media multitasking for youth: A review. *Computers in Human Behavior*, 53, 204–215. <https://doi.org/10.1016/j.chb.2015.06.035>; L. Mark Carrier, Larry D. Rosen, Nancy A. Cheever, Alex F. Lim, Causes, effects, and practicalities of everyday multitasking, *Developmental Review* (2015), doi: 10.1016/j.dr.2014.12.005.

³⁸ Ralph, B. C., Thomson, D. R., Cheyne, J. A., & Smilek, D. (2014). Media multitasking and failures of attention in everyday life. *Psychological research*, 78(5), 661–669. <https://doi.org/10.1007/s00426-013-0523-7>.

³⁹ Ophir, E., Nass, C., & Wagner, A. D. (2009). Cognitive control in media multitaskers. *Proceedings of the National Academy of Sciences of the United States of America*, 106(37), 15583–15587. <https://doi.org/10.1073/pnas.0903620106>; Ralph, B. C., Thomson, D. R., Cheyne, J. A., & Smilek, D. (2014). Media multitasking and failures of attention in everyday life. *Psychological research*, 78(5), 661–669. <https://doi.org/10.1007/s00426-013-0523-7>; Baumgartner, S. E., Weeda, W. D., van der Heijden, L. L., & Huizinga, M. (2014). The Relationship Between Media Multitasking and Executive Function in Early Adolescents. *The Journal of Early Adolescence*, 34(8), 1120–1144. <https://doi.org/10.1177/0272431614523133>; Baumgartner, Susanne & van der Schuur, Winneke & Lemmens, Jeroen & te Poel, Fam. (2018). The Relationship Between Media Multitasking and Attention Problems in Adolescents: Results of Two Longitudinal Studies. *Human Communication Research*. 44. 3-30. 10.1093/hcre.12111.



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with peers can be a protective factor against suicide risk and enhance a child's wellness. Friendships and communities are critical parts of brain development and key aspects of healthy, fulfilling lives. Many youth make and sustain friendships online that can have real-life benefits on their mental health.

Research suggests that by engaging with social media in a healthy way, youth can see positive effects on their psychological development.⁴⁰ Finding social support and companionship online can provide children and young adults with healthy and alternative socialization experiences, especially when in-person interaction might not be possible. In particular, online platforms and groups can be beneficial to young adults experiencing a mental health crisis, or those who are members of populations who are at increased risk for suicide and mental health conditions – like LGBTQIA+ youth and young adults. If these youth and young adults have a space and open forum in which to ask questions and interact with those who understand their unique needs and perspectives, it can be an effective tool in ensuring positive and healthy outcomes for these youth.

It is important to acknowledge that research on social media use and adolescent development is relatively new, as are many social media platforms. In addition, there has been remarkably little funding designated for research on this topic. Consequently, the long-term effects of social media use on youth development is relatively uncharted. Yet, it is unknown whether adolescent brain development, known for its plasticity, may “correct” some of the alternations in brain structure or function, whether compensatory neural processes may develop, or whether these alterations may confer unknown future strengths.

In addition, there is some research demonstrating that social media use is linked with positive outcomes that may benefit psychological development among youth. Perhaps most notably, psychological research suggests that young people form and maintain friendships online. These relationships often afford opportunities to interact with a more diverse peer group than offline, and the relationships are close and meaningful and provide important support to youth in times of stress⁴¹. The buffering effects of social support from peers has been well documented in the psychological literature⁴². This may be especially important for youth with marginalized

⁴⁰ American Psychological Association. (2023). *Health advisory on social media use in*

adolescence. <https://www.apa.org/topics/social-media-internet/health-advisory-adolescent-social-media-use>

⁴¹ Anderson, M., & Jiang, J. (2018, November 28). 2. Teens, friendships and online groups. Pew Research Center: Internet, Science & Tech; Pew Research Center: Internet, Science & Tech. <https://www.pewresearch.org/internet/2018/11/28/teens-friendships-and-online-groups/>; Charmaraman L, Hodes R, Richer AM. Young Sexual Minority Adolescent Experiences of Self-expression and Isolation on Social Media: Cross-sectional Survey Study. *JMIR Ment Health*. 2021;8(9):e26207.

doi:10.2196/26207; Massing-Schaffer M, Nesi J, Telzer EH, Lindquist KA, Prinstein MJ. Adolescent Peer Experiences and Prospective Suicidal Ideation: The Protective Role of Online-Only Friendships. *J Clin Child Adolesc Psychol*. 2022;51(1):49-60. doi:10.1080/15374416.2020.1750019; Marciano L, Ostroumova M, Schulz PJ, Camerini A-L. Digital Media Use and Adolescents' Mental Health During the Covid-19 Pandemic: A Systematic Review and Meta-Analysis. *Front Public Health*. 2021;9:793868. doi:10.3389/fpubh.2021.793868; Baskin-Sommers A, Simmons C, Conley M, et al. Adolescent civic engagement: Lessons from Black Lives Matter. *Proc Natl Acad Sci USA*. 2021;118(41). doi:10.1073/pnas.2109860118.

⁴² Cohen, S., & Wills, T. A. (1985). Stress, social support, and the buffering hypothesis. *Psychological Bulletin*, 98(2), 310–357. <https://doi.org/10.1037/0033-2909.98.2.310>.



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identities, including racial, ethnic, sexual, and gender minorities. Digital platforms provide an important space for self-discovery and expression for LGBTQ+ youth.

Research also suggests that during the COVID-19 lockdown from 2020-2021, the use of one-on-one (i.e., direct messaging) on social media and sharing funny content reduced stress among youth. There also is some evidence that youth are more likely to engage in civic activism online than off⁴³.

A growing area of research has also focused on the use of youths' interest in online activities as an opportunity for digital-based intervention⁴⁴. Adolescents report high levels of comfort with, and a preference for, online communication, especially when discussing mental health. Studies also show that adolescents commonly use the internet for mental health information⁴⁵. These elements, taken together, present the possibility that digital modes of treatment and other health interventions may be particularly effective for young people.

Research into the field of digital mental health interventions is growing and the existing information is heavily skewed toward more established modalities (e.g., telehealth, online/web-based interventions). Evidence supports the use of videoconferencing as an effective form of treatment for youth mental health across a range of problems⁴⁶. While many computerized programs and internet-based treatment programs were found to be of moderate to high quality, a systematic review of the literature found that the inclusion of a therapist or clinician improved outcomes in adolescents with depression and anxiety over those that were self-paced⁴⁷. Young people with a history of suicidal ideation often prefer to initially seek and receive healthcare online⁴⁸. Even when individuals have strong support systems offline, they may struggle to

⁴³ Marciano, L., Ostroumova, M., Schulz, P. J., & Camerini, A. L. (2022). Digital Media Use and Adolescents' Mental Health During the Covid-19 Pandemic: A Systematic Review and Meta-Analysis. *Frontiers in public health*, 9, 793868. <https://doi.org/10.3389/fpubh.2021.793868>.

⁴⁴ Bradford, S., & Rickwood, D. (2015). Young people's views on electronic mental health assessment: Prefer to type than talk? *Journal of Child and Family Studies*, 24(5), 1213–1221. <https://doi.org/10.1007/s10826-014-9929-0>.

⁴⁵ Intervention and Prevention in the Digital Age. (2022). In J. Nesi, E. Telzer, & M. Prinstein (Eds.), *Handbook of Adolescent Digital Media Use and Mental Health* (pp. 363-416). Cambridge: Cambridge University Press. doi:10.1017/9781108976237.019; Park, E., & Kwon, M. (2018). Health-Related Internet Use by Children and Adolescents: Systematic Review. *Journal of medical Internet research*, 20(4), e120. <https://doi.org/10.2196/jmir.7731>.

⁴⁶ Myers, K. M., Valentine, J. M., Melzer, S. M. (2007, Nov). Feasibility, acceptability, and sustainability of telepsychiatry for children and adolescents. *Psychiatric Services*, 58(11), 1493-1496. <https://doi.org/10.1176/ps.2007.58.11.1493>; Nelson, E. L., Cain, S., & Sharp, S. (2017, Jan). Considerations for conducting telemental health with children and adolescents. *Child Adolescent Psychiatric Clinics of North America*, 26(1), 77-91. <https://doi.org/10.1016/j.chc.2016.07.008>.

⁴⁷ Clarke, T. C., Black, L. I., Stussman, B. J., Barnes, P. M., & Nahin, R. L. (2015). Trends in the use of complementary health approaches among adults: United States, 2002-2012. *National health statistics reports*, (79), 1–16.; Wozney L, McGrath P, Gehring N, Bennett K, Huguet A, Hartling L, Dyson M, Soleimani A, Newton A. eMental Healthcare Technologies for Anxiety and Depression in Childhood and Adolescence: Systematic Review of Studies Reporting Implementation Outcomes. *JMIR Ment Health* 2018;5(2):e48. <https://mental.jmir.org/2018/2/e48>; Hollis, C., Falconer, C. J., Martin, J. L., Whittington, C., Stockton, S., Glazebrook, C., & Davies, E. B. (2017). Annual Research Review: Digital health interventions for children and young people with mental health problems - a systematic and meta-review. *Journal of child psychology and psychiatry, and allied disciplines*, 58(4), 474–503. <https://doi.org/10.1111/jcpp.12663>.

⁴⁸ Frost, M., Casey, L. M., & O'Gorman, J. G. (2017). Self-injury in young people and the help-negation effect. *Psychiatry Research*, 250, 291–296. <https://doi.org/10.1016/j.psychres.2016.12.022>.



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access that support in times of need ⁴⁹. Early indications that online support may be appealing because of its immediate nature and because the interactions are among peers with shared experience and experiential knowledge ⁵⁰. Yet, it is crucial for young people to have access to in-person screenings and clinician support.

Current and Future Industry Efforts to Mitigate Harms and Promote the Health, Safety, and Well-being of Minors

Providing parents, guardians, and their children with the tools and education needed to differentiate harmful content and to engage in a healthy, supportive way with online platforms can lead to safer experiences and mitigate harms. If guardians and minor users can be made aware of harms that they could be exposed to and equipped with the habits and mindfulness that could help them identify those influences and cope with them in a healthy way, they will have healthier interactions with the online world. For example, being trained to identify what goes into glamorous photoshoots of models that are posted on Instagram to avoid or regulate thoughts of self-comparison among teenagers can help them recognize what is real and what is staged.

Search engines can additionally utilize algorithms to choose to promote positive resources to users online. For example, search engine platforms can boost the 988 Suicide & Crisis Lifeline as the first result whenever a user searches for anything related to suicide.

Furthermore, additional research is needed to determine the extent and severity of the impacts of social media use on the mental health, privacy, and safety of children and young adults. Social media platforms must provide researchers with data to understand online activity to help further prevent these harms.

Policy Recommendations

Given the likely harms and benefits provided by social media, we encourage the Task Force to take a multifaceted approach in addressing this important issue. We respectfully urge the NTIA to work with social media and search engine platforms to enable certain protections by default for users under the age of 18. Such protections may include, but need not be limited to:

- Disabling algorithmic promotion of products to minors;

⁴⁹ Kruzan, K. P., Whitlock, J., & Bazarova, N. N. (2021). Examining the Relationship Between the Use of a Mobile Peer-Support App and Self-Injury Outcomes: Longitudinal Mixed Methods Study. *JMIR Mental Health*, 8(1), e21854. <https://doi.org/10.2196/21854>; Lavis, A., & Winter, R. (2020). #Online harms or benefits? An ethnographic analysis of the positives and negatives of peer-support around self-harm on social media. *Journal of Child Psychology and Psychiatry, and Allied Disciplines*, 61(8). <https://doi.org/10.1111/jcpp.13245>.

⁵⁰ Marchant, A., Hawton, K., Stewart, A., Montgomery, P., Singaravelu, V., Lloyd, K., Purdy, N., Daine, K., & John, A. (2017). A systematic review of the relationship between internet use, self-harm and suicidal behaviour in young people: The good, the bad and the unknown. *PLOS ONE*, 12(8), e0181722. <https://doi.org/10.1371/journal.pone.0181722>; Thoits, P. A. (2011). Mechanisms Linking Social Ties and Support to Physical and Mental Health. *Journal of Health and Social Behavior*, 52(2), 145–161. <https://doi.org/10.1177/0022146510395592>.



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- Utilizing tools to detect and prevent the display of harmful content for minors, including content promoting or providing instructions for self-harm, eating disorders, or suicide;
- Allowing limited parental monitoring of usage in a way that ensures user privacy, to help limit usage and promote healthy sleep schedules for children and youth while simultaneously enabling them to engage with online communities; and

The internet and the introduction of social media platforms have literally changed our species through new forms of social interaction, new rules for discourse, the rapid spread of information, and concomitant changes in the types of relationships that previously had defined the human race for millennia. This is an extraordinarily high priority area for additional scientific research; however, this work has been woefully underfunded. Currently, federal agencies lack the direction, expertise, and dedicated funding to adequately research both the positive and negative impacts of online platforms. Tech companies responsible for these platforms employ dozens of researchers focused on designing products and observing how users engage with them. The federal government must match or exceed this commitment to ensure the public has an adequate understanding of how these platforms work and how users, especially children, are utilizing these platforms and their impact. The research that is needed should be longitudinal to allow for long-term follow-up. Research should capture the experience of diverse samples, utilize the benefits of technology to capture objective measures of behavior, include technology (e.g., fMRI) to study biopsychosocial effects, and importantly, should make use of the data available to social media companies to fully understand the effects of social media and protect the common good. This effort must be paired with required increases in transparency and access to data for researchers to further understand online activity. New transparency and reporting requirements should ensure user privacy, while creating new mechanisms for researchers and policymakers to understand how these online spaces operate.

Recently, Congress allocated \$15M to research on social media and adolescent mental health. This is appreciated, yet barely sufficient to fund more than 3-5 individual studies that would meet the abovementioned specifications. At least \$100M in funds will be needed to reflect a serious commitment to this research area across federal agencies. And, as we are on the precipice of a new digital age with artificial intelligence (AI) and machine learning directly impacting us across the lifespan, it is paramount that our country invest in research to protect future generations.

Such research also might address the role of social media algorithms on users' experiences. This requires access to data for independent researchers to understand how algorithms work⁵¹. Social media companies employing algorithms to display content to users should take steps to provide explanations on how these technologies work and how they might drive or reward certain types of posts or behavior. Data from algorithms, along with internal research, should also be made

⁵¹ Epps-Darling, A., Bouyer, R. T., & Cramer, H. (2020, October). Artist gender representation in music streaming. In Proceedings of the 21st International Society for Music Information Retrieval Conference (Montréal, Canada) (ISMIR 2020). ISMIR (pp. 248-254); Bravo, D. Y., Jefferies, J., Epps, A., & Hill, N. E. (2019). When things go viral: Youth's discrimination exposure in the world of social media. In Handbook of Children and Prejudice (pp. 269-287). Springer, Cham. https://doi.org/10.1007/978-3-030-12228-7_15.

public to allow researchers and policymakers to achieve a greater understanding of the impacts of social media on users, particularly children. Federal agencies should prioritize research into the impacts of social media and provide private researchers with grants and other support to ensure findings relating to these platforms are made broadly available.

There is much more Congress and federal agencies can do to provide education around how best to use online platforms to mitigate harmful impacts. A coalition of more than 150 organizations, led by APA, have called on the Surgeon General to create and distribute resources dedicated to teaching children and caregivers about online social media use ⁵². There is a clear need for an education campaign that enhances the public's understanding of the potential harms posed by social media and encourages caregivers and children to educate themselves with evidence-informed suggestions for its appropriate use. At the same time, it is important to acknowledge social media's potential to provide children with a healthy space for convening and companionship. While we recognize the need for additional research in this area, the very real harms of social media are impacting our children today, and more must be done to communicate and mitigate the impacts of online social media use. Educating young users and their caregivers about how best to use the platforms to mitigate negative impacts is an essential intervention that can start today. A public education campaign should include information about the specific dangers social media poses to adolescents, how parents and caregivers can best navigate learning more about these dangers, how best to communicate the risks with their children, and ultimately how to educate their children on the best methods for using social media in a safe way.

APA and AFSP also advocates for Congress and federal agencies to require social media companies to do more to combat this issue. Platforms can create and provide new tools aimed at mitigating the harms associated with platform use. Requiring social media companies to provide children and their caregivers with options to make changes to their social media settings can promote mental health by protecting their information, disabling features that are particularly addictive, and opting out of algorithm processes that serve up problematic or harmful content. Social media companies can also be required to set defaults to address harms to young users.

Warnings on harmful content should also be considered to reduce exposure of young people to content that may negatively impact their mental health or well-being and companies should be held accountable for the proliferation of this content. Social media companies should acknowledge known impacts of their platforms, providing warnings and resources to parents and caregivers of young users, develop plans to mitigate known harms, and determine whether these warnings and plans were effective, with iterative updates based on these findings. Social media platforms must work to prevent and mitigate harmful content, such as promotion of self-harm, suicide, eating disorders, substance use and sexual exploitation. Independent audits can assess risks and determine whether platforms are taking meaningful steps to prevent damage and these must be paired with enforcement actions and accountability mechanisms for when platforms fail to effectively mitigate harms to children.

⁵² (2023). Apaservices.org. <https://www.apaservices.org/advocacy/news/surgeon-general-dangers-social-media>



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More must also be done to specifically protect those children belonging to traditionally marginalized and minoritized communities. Mental health and other harms can disproportionately fall on LGBTQ+ youth, and resources should be dedicated to ensuring a reduction in these harms. More must be required of platforms to discourage and prevent cyberbullying and other forms of online hate and discrimination. Reporting structures should be more robust to allow for instances to be tracked and discouraged. Reforms to platform user experience should be prioritized to ensure members of these communities are protected from disproportionate harm.

Specific legislation has been proposed across the federal government that would take productive steps in mitigating the known negative impacts of social media. The Kids Online Safety Act (KOSA) is one such piece of legislation. In 2022, APA CEO Arthur C. Evans Jr., PhD, said, “The Kids Online Safety Act is an important first step in reining in the harms caused to children by social media platforms,” and “enacting measures that curtail harmful practices while authorizing research to understand additional impacts is a thoughtful strategy”⁵³. KOSA and other previously proposed legislative fixes such as updates to the Children Online Privacy and Protection Act represent important steps by Congress and we encourage their debate and adoption.

While implementing these policy recommendations, we strongly encourage social media and search platforms to ensure sufficient user privacy to allow minor users to find social supports online and avoid discrimination. As was addressed earlier, social media can provide a safe refuge for users in times of great difficulty. We encourage the above policy recommendations while working to ensure that individuals are still able to find support online and retain a reasonable level of privacy.

Thank you again for the opportunity to weigh in on these questions. To the extent that our organizations can serve as a resource to your efforts, please feel free to reach out to Corbin Evans (Senior Director Congressional & Federal Relations, Science Advocacy) at CEvans@apa.org and to Emily Feltren (Senior Director, Federal Policy and Advocacy) at EFeltren@afsp.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Mitch Prinstein".

Mitch Prinstein, PhD, ABPP
Chief Science Officer
American Psychological Association

⁵³ (2023). *Apaservices.org*. <https://www.apaservices.org/advocacy/news/kids-online-safety-legislation>



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