

# **EXHIBIT 48**

## Potential risks of content, features, and functions: The science of how social media affects youth



Almost a year after APA issued its [health advisory on social media use in adolescence](#), society continues to wrestle with ways to maximize the benefits of these platforms while protecting youth from the potential harms associated with them.<sup>1</sup>

By early 2024, few meaningful changes to social media platforms had been enacted by industry, and no federal policies had been adopted. There remains a need for social media companies to make fundamental changes to their platforms.

Psychological science continues to reveal [benefits from social media use](#), as well as risks and opportunities that certain content, features, and functions present to young social media users. The science discussed below highlights the need to enact new, responsible safety standards to mitigate harm.<sup>2</sup>

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- [How much is too much social media use?](#)

Elaboration of science on social media content, features, and functions

Platforms built for adults are not inherently suitable for youth.<sup>i</sup> Youth require special protection due to areas of competence or vulnerability as they progress through the childhood, teenage, and late adolescent years.<sup>ii</sup> This is especially true for youth experiencing psychological, physical, intellectual, mental health, or other developmental challenges; **chronological age is not directly associated with social media readiness.**<sup>iii</sup>

Hypersensitivity to social feedback

[Brain development starting at ages 10–13](#) (i.e., the outset of puberty) until approximately the mid-twenties is linked with hypersensitivity to social feedback/stimuli.<sup>iv</sup> In other words, youth become especially invested in behaviors that will help them get personalized feedback, praise, or attention from peers.

- **AI-recommended content** has the potential to be especially influential and hard to resist within this age range.<sup>v</sup> It is critical that AI-recommended content be designed to prioritize youth safety and welfare over engagement. This suggests potentially restricting the use of personalized recommendations using youth data, design features that may prioritize content evoking extreme emotions, or content that may depict illegal or harmful behavior.
- **Likes and follower counts** activate neural regions that trigger repetitive behavior, and thus may exert greater influence on youths' attitudes and behavior than among adults.<sup>vi</sup> Youth are especially sensitive to both positive social feedback and rejection from others. Using these metrics to maintain platform engagement capitalizes on youths' vulnerabilities and likely leads to problematic use.
- The **use of youth data for tailored ad content** similarly is influential for youth who are biologically predisposed toward peer influence at this stage and sensitive to personalized content.<sup>vii</sup>



### Need for relationship skill building

Adolescence is a critical period for the development of more complex relationship skills, characterized by the ability to form emotionally intimate relationships.<sup>viii</sup> The adolescent years should provide opportunities to practice these skills through one-on-one or small group interactions.

- The **focus on metrics** of followers, likes, and views focuses adolescents' attention on unilateral, depersonalized interactions and may discourage them from building healthier and psychologically beneficial relationship skills.<sup>ix</sup>

### Susceptibility to harmful content

Adolescence is a period of heightened susceptibility to peer influence, impressionability, and sensitivity to social rejection.<sup>x</sup> Harmful content, including cyberhate, the depiction of illegal behavior, and encouragement to engage in self-harm (e.g., cutting or eating-disordered behavior) is associated with increased mental health difficulties among both the targets and witnesses of such content.<sup>xi</sup>

- The **absence of clear and transparent processes for addressing reports** of harmful content makes it harder for youth to feel protected or able to get help in the face of harmful content.

### Underdeveloped impulse control

Youths' developing cortical system (particularly in the brain's inhibitory control network) makes them less capable of resisting impulses or stopping themselves from behavior that

may lead to temporary benefit despite negative longer-term consequences.<sup>xii</sup> This can lead to adolescents making decisions based on short-term gain, lower appreciation of long-term risks, and interference with focus on tasks that require concentration.

- **Infinite scroll** is particularly risky for youth since their ability to monitor and stop engagement on social media is more limited than among adults.<sup>xiii</sup> This contributes to youths' difficulty disengaging from social media and may contribute to high rates of youth reporting symptoms of clinical dependency on social media.<sup>xiv</sup>
- The **lack of time limits** on social media use similarly is challenging for youth, particularly during the school day or at times when they should be doing homework.<sup>xv</sup>
- **Push notifications** capitalize on youths' sensitivity to distraction. Task-shifting is a higher order cognitive ability not fully developed until early adulthood and may interfere with youths' focus during class time and when they should be doing homework.<sup>xvi</sup>
- The **use and retention of youths' data** without appropriate parental consent, and/or child assent in developmentally appropriate language, capitalizes on youths' relatively poor appreciation for long-term consequences of their actions, permanence of online content, or their ability to weigh the risks of their engagement on social media.<sup>xvii</sup>

#### Reliance on sleep for healthy brain development

Other than the first year of life, puberty is the most important period of brain growth and reorganization in our lifetimes.<sup>xviii</sup> Sleep is essential for healthy brain development and mental health in adolescence.<sup>xix</sup> Sleep delay or disruptions have significant negative effects on youths' attention, behavior, mood, safety, and academic performance.

- A **lack of limits on the time of day** when youth can use social media has been cited as the predominant reason why adolescents are getting less than the recommended amount of sleep, with significant implications for brain and mental health.<sup>xx</sup>



### Vulnerability to malicious actors

Youth are easily deceived by predators and other malicious actors who may attempt to interact with them on social media channels.<sup>xxi</sup>

- **Connection and direct messaging with adult strangers** places youth at risk of identity theft and potentially dangerous interactions, including sexexploitation.

### Need for parental/caregiver partnership

Research indicates that youth benefit from [parental support to guide them toward safe decisions](#) and to help them understand and appropriately respond to complex social interactions.<sup>xxii</sup> Granting parents oversight of youths' accounts should be offered in balance with adolescents' needs for autonomy, privacy, and independence. However, it should be easier for parents to partner with youth online in a manner that fits their family's needs.

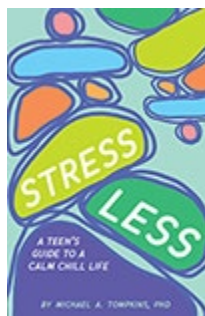
- **The absence of transparent and easy-to-use parental/caregiver tools** increases parents' or guardians' difficulty in supporting youths' experience on social media.<sup>xxiii</sup>

### [Health advisory on social media use in adolescence](#)

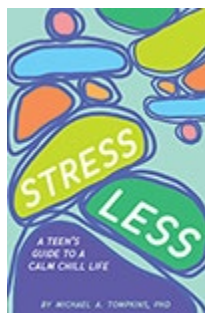
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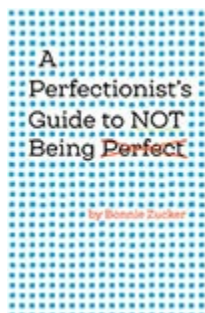
## Recommended Reading



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A path forward based on science

Change is needed soon. Solutions should reflect a greater understanding of the science in at least three ways.

First, youth vary considerably in how they use social media. Some uses may promote healthy development and others may create harm. As noted in the [APA health advisory](#), using social media is not inherently beneficial or harmful to young people. The effects of social media depend not only on what teens can do and see online, but teens' pre-existing strengths or vulnerabilities, and the contexts in which they grow up.

Second, science has highlighted biological and psychological abilities/vulnerabilities that interact with the content, functions, and features built into social media platforms, and it is these aspects of youths' social media experience that must be addressed to attenuate risks.<sup>xxiv</sup> Social media use, functionality, and permissions/consenting should be tailored to youths' developmental capabilities. Design features created for adults may not be appropriate for children.

Third, youth are adept at working around age restrictions. Substantial data reveal a remarkable number of children aged 12 years and younger routinely using social media, indicating that current policies and practices to restrict use to older youth are not working.<sup>xxv</sup>

**Policies will not protect youth unless technology companies are required to reduce the risks embedded within the platforms themselves.**

As policymakers at every level assess their approach to this complex issue, it is important to note the limitations of frequently proposed policies, which are often misreported and fall far short of comprehensive safety solutions that will achieve meaningful change.

**Restricting downloads**

Restricting application downloads at the device level does not fully restrict youths' access and will not meaningfully improve the safety of social media platforms. Allowing platforms to delegate responsibility to app stores does not address the vulnerabilities and harms built into the platforms.



**Requiring age restrictions**

Focusing only on age restrictions does not improve the platforms or address the biological and psychological vulnerabilities that persist past age 18. While age restriction proposals could offer some benefits if effectively and equitably implemented, they do not represent comprehensive improvements to social media platforms, for at least four reasons:

1. Creating a bright line age limit ignores individual differences in adolescents' maturity and competency
2. These proposals fail to mitigate the harms for those above the age limit and can lead to a perception that social media is safe for adolescents above the threshold age, though neurological changes continue until age 25

3. Completely limiting access to social media may disadvantage those who are experiencing psychological benefits from social media platforms, such as community support and access to science-based resources, which particularly impact those in marginalized populations
4. The process of age-verification requires more thoughtful consideration to ensure that the storage of official identification documents does not systematically exclude subsets of youth, create risks for leaks, or circumvent the ability of young people to maintain anonymity on social platforms.

### Use of parental controls

Granting [parents and caregivers greater access](#) to their children's social media accounts will not address risks embedded within platforms themselves. More robust and easy-to-use parental controls would help some younger age groups, but as a sole strategy, this approach ignores the complexities of adolescent development, the importance of childhood autonomy and privacy, and disparities in time or resources available for monitoring across communities.<sup>xxvi</sup>

**[Related: [Keeping teens safe on social media: What parents should know to protect their kids](#)]**

Some parents might be technologically ill-equipped, lack the time or documentation to complete requirements, or simply be unavailable to complete these requirements. Disenfranchising some young people from these platforms creates inequities.<sup>xxvii</sup>



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<sup>1</sup> These recommendations enact policies and resolutions approved by the APA Council of Representatives including the [APA Resolution on Child and Adolescent Mental and Behavioral Health](#) and the [APA Resolution on Dismantling Systemic Racism](#) in contexts including social media. These are not professional practice guidelines but are intended to provide information based on psychological science.

<sup>2</sup> This report seeks to elaborate on extant psychological science findings, which may be particularly relevant in the creation of policy solutions that protect young people, and to inform the development of social media safety standards.

## Recommendations from APA's health advisory on social media use in adolescence

1. Youth using social media should be encouraged to use functions that create opportunities for social support, online companionship, and emotional intimacy that can promote healthy socialization.
2. Social media use, functionality, and permissions/consenting should be tailored to youths' developmental capabilities; designs created for adults may not be appropriate for children.
3. In early adolescence (i.e., typically 10–14 years), adult monitoring (i.e., ongoing review, discussion, and coaching around social media content) is advised for most youths' social media use; autonomy may increase gradually as kids age and if they gain digital literacy skills. However, monitoring should be balanced with youths' appropriate needs for privacy.

4. To reduce the risks of psychological harm, adolescents' exposure to content on social media that depicts illegal or psychologically maladaptive behavior, including content that instructs or encourages youth to engage in health-risk behaviors, such as self-harm (e.g., cutting, suicide), harm to others, or those that encourage eating-disordered behavior (e.g., restrictive eating, purging, excessive exercise) should be minimized, reported, and removed; moreover, technology should not drive users to this content.
5. To minimize psychological harm, adolescents' exposure to "cyberhate" including online discrimination, prejudice, hate, or cyberbullying especially directed toward a marginalized group (e.g., racial, ethnic, gender, sexual, religious, ability status), or toward an individual because of their identity or allyship with a marginalized group should be minimized.
6. Adolescents should be routinely screened for signs of "problematic social media use" that can impair their ability to engage in daily roles and routines, and may present risk for more serious psychological harms over time.
7. The use of social media should be limited so as to not interfere with adolescents' sleep and physical activity.
8. Adolescents should limit use of social media for social comparison, particularly around beauty- or appearance-related content.
9. Adolescents' social media use should be preceded by training in social media literacy to ensure that users have developed psychologically-informed competencies and skills that will maximize the chances for balanced, safe, and meaningful social media use.
10. Substantial resources should be provided for continued scientific examination of the positive and negative effects of social media on adolescent development.

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