

# AMERICAN ACADEMY OF CHILD & ADOLESCENT PSYCHIATRY

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November 16, 2023

Administrator Alan Davidson

Department of Commerce

National Telecommunications and Information Administration

1401 Constitution Ave., NW

Washington, DC 20230

*Re: Initiative To Protect Youth Mental Health, Safety & Privacy Online  
(NTIA-2023-0008)*

Dear Administrator Davidson:

On behalf of the American Academy of Child and Adolescent Psychiatry (AACAP), I am writing today to provide comments on the National Telecommunications and Information Administration's (NTIA) request for comment on protecting the mental health, safety, and privacy of children and youth online. AACAP is the professional home to 10,000 child and adolescent psychiatrists, some of whom also treat adults and transitional age youth (age 18 years and above). Our mission includes promoting the healthy development of children, adolescents, and families. AACAP therefore has a strong interest in protecting youth from harm online, and we support the Biden-Harris Administration's focus on addressing the mental health of our children and youth and the establishment of the federal Task Force on Kids Online Health and Safety. Social media companies must be held to higher standards in order to protect children and youth, our most vulnerable citizens, and we sincerely appreciate these efforts and public policy can play an important role in establishing and enforcing this standard.

There has been a substantial increase in social media engagement among children and adolescents in recent years. The trend was further amplified by the isolation brought about by the COVID-19 pandemic as social media use and online gaming became primary methods of socialization. According to the U.S. Surgeon General's *Advisory on Youth*

*Mental Health*, social media use is nearly universal among children and youth with up to 95% of our youth active online. While the minimum age requirement is 13 on most platforms available in the United States, data from the *Advisory* suggests that nearly 40% of children aged 8-12 are on social media<sup>i</sup>. Rates of depression and anxiety have risen in lockstep with increases in social media engagement among youth<sup>ii</sup>. Children and youth are affected by social media use in different ways depending on individual personality traits, strengths and vulnerabilities, and experiences online. There are, however, issues that stem from excessive social media use including developing a negative body image, unrealistic self-comparisons, sleep disruption, cyberbullying, and a whole host of other adverse effects for youth spending more than 3 hours per day on social media, doubling their risk for poor mental health. According to the U.S. Surgeon General's *Advisory*, cited above, the average teenager spends 3.5 hours per day on social media use, a very troubling statistic that calls for immediate action.

It should also be noted that online experiences can be positive. For some children and youth, online communities can be a source of support from others who have shared interests, or shared experiences<sup>iii</sup>. Youth in crisis are more likely to share suicidality on social media than directly with caregivers, and concerned peers often alert adults, which frequently leads to vital referrals to emergency services and child and adolescent psychiatry<sup>iv</sup>. The Crisis Text Line, for example, is easy to contact via Facebook and TikTok, and can connect youth in crisis with someone to text with and the resources they need. The federal safety net for youth has been strengthened further through the launch of the 988 Crisis Hotline, also accessible through social media platforms.

A lack of transparency from social media companies has been a barrier to understanding the scale and impact of social media use on mental health and well-being, and greater transparency is needed on algorithms in use and data that is being collected. Technology and social media companies must assume responsibility for the impact of their products on children and adolescents and ensure that their platforms foster safe and healthy online environments for their youngest users, considering the needs of specific populations including racial, ethnic, gender minorities, and girls. Policymakers must ensure that social media companies operate more transparently, limit the collection of children's data, and eliminate the use of harmful algorithms that can create addictive patterns of behavior, and prioritize the health and safety for our youth.

There is currently not enough evidence to conclude that social media use is sufficiently safe for children and youth. However, the aforementioned risks and benefits are well documented. To mitigate the risks and harms associated with social media use, AACAP recommends<sup>v</sup>:

- Strengthening online privacy protections and creating effective controls allowing youth and their caregivers to manage screen access and content and share relevant data for further independent research on social media's effect on youth mental health.
- Increasing federal funding for future research on the potential benefits and harms of social media use on youth mental health.

- Minimizing exposure to problematic content including that which promotes self-harm, unreasonable standards of beauty, cyberbullying, prejudice, and health misinformation.
- Promoting engagement between social media platforms and child and adolescent psychiatrists and other behavioral health professionals to develop guidelines for age-appropriate content and digital literacy training.
- Ensuring that parents and caregivers have ongoing discussions with children and youth about appropriate digital behaviors, the potential pitfalls inherent in social media use, online safety, and family expectations with respect to screen free periods of time and adequate sleep.

AACAP appreciates the opportunity to discuss our concerns and recommendations for ways to address the harmful effects of social media in order to protect and improve the mental health of our children and youth. Although we are still learning about the benefits and harms of social media use on children, we know enough to suggest that action by policymakers and technology companies is urgently needed to protect our children and youth, and their developing brains, from the deleterious effects of social media use. AACAP would welcome the opportunity to share the expertise of its members who have experience in this area. Please contact Karen Ferguson, Deputy Director of Clinical Practice, at [kferguson@aacap.org](mailto:kferguson@aacap.org) with any questions.

Sincerely,



Tami D. Benton, MD  
President

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<sup>i</sup> [Surgeon General Issues New Advisory About Effects Social Media Use Has on Youth Mental Health | HHS.gov](#)

<sup>ii</sup> [Social media use and depression in adolescents: a scoping review - PMC \(nih.gov\)](#)

<sup>iii</sup> [Social Media and Teens \(aacap.org\)](#)

<sup>iv</sup> [Policy Statement on the Impact of Social Media on Youth Mental Health \(aacap.org\)](#)

<sup>v</sup> [Policy Statement on the Impact of Social Media on Youth Mental Health \(aacap.org\)](#)