

January 18, 2023

Daniel Freer
Office of the Secretary Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20580

RE: Center for Digital Democracy, et al. Petition for Rulemaking

Dear Mr. Freer,

We write as leading mental health organizations working to address the national mental health crisis, which is disproportionately affecting our youth. As the Commission decides how to prioritize its resources, we want to express our strong support for moving forward with rulemaking and underscore the enormity of the public health implications of social media design on youth mental health.

The data on youth mental health shows a deeply concerning trajectory with steady increases as social media became more prevalent. Even prior to the COVID-19 pandemic, adolescents in the US began to experience greater rates of mental health problems. In 2019, data from the National Survey on Drug Use and Health indicated that 16 percent of youth ages 12-17 reported experiencing a past-year major depressive episode (MDE), compared to 8 percent in 2009, double the previous rate.¹ Rates of children's emergency department visits related to deliberate self-harm increased 329 percent between 2007 and 2016.² Deaths by suicide continue to be the second leading cause of death for youth and the suicide death rate of Black youth have been increasing at a greater rate than any other racial/ethnic group.³ Additionally, suicide-related content may potentially increase suicide risk when consumed by youth who are already vulnerable. A recent study of over 400 youth who were psychiatrically hospitalized showed that a meaningful proportion reported viewing online content that depicted suicide (14.8%) or self-injury (16.6%) in the two weeks leading up to their admission.⁴

The Surgeon General recently issued an [advisory](#) on protecting youth mental health that recognized the role of social media, especially designs that encouraged passive engagement, on youth mental health. The American Academy of Pediatrics, American Academy of Adolescent and Child Psychiatry and the Children's Hospital Association have [declared](#) a national emergency in children's mental health. While obesity, smoking, and pregnancy have declined for young people, depression and suicide have continued to increase, making the mental health implications of social media one of the greatest public health issues facing our country.

The Administration and states have been working to address youth mental health, but much of the work is focused on identifying and treating existing conditions. This FTC rulemaking would be a critical component of an overall national effort because it would remove unfair design features that cause harm and thus, prevent mental health conditions and suicidality. Given the extraordinary number of children and youth affected by these conditions, it is not possible to increase treatment sufficiently to meet the

¹ Substance Abuse and Mental Health Services Administration (2019). Results from the 2019 National Survey on Drug Use and Health: Detailed Tables. Retrieved from

<https://www.samhsa.gov/data/sites/default/files/reports/rpt29394/NSDUHDetailedTabs2019/NSDUHDetTabsSect11pe2019.htm>

² Lo, C. B., Bridge, J. A., Shi, J., Ludwig, L., & Stanley, R. M. (2020). Children's Mental Health Emergency Department Visits: 2007-2016. *Pediatrics*, 145(6), e20191536. <https://doi.org/10.1542/peds.2019-1536>

³ Watson Coleman, B. Ring the Alarm: The Crisis of Black Youth Suicide in America. *National Action Alliance for Suicide Prevention*. (2020). Retrieved from https://theactionalliance.org/sites/default/files/ring_the_alarm-the_crisis_of_black_youth_suicide_in_america_copy.pdf

⁴ Nesi J, Prinstein MJ (2015) Using social media for social comparison and feedback-seeking: Gender and popularity moderate associations with depressive symptoms. *J Abnorm Child Psychol* 43(8):1427-1438

need. The overall strategy must include prevention and addressing the underlying causes of the crisis. The FTC rulemaking would be a critical part of a proactive strategy to address the youth mental health crisis.

This strategy would be particularly helpful in addressing the effect of social media on eating disorders, body image, and suicide. Numerous research studies have found high frequency and prolonged use of social media is linked with negative body image which increase the risk for disordered eating and eating disorders.⁵

Specifically, Instagram includes 90,000 unique pro-eating disorder accounts with a reach of 20 million followers.⁶ Children as young as 9 and 10 follow three or more pro-eating disorder accounts. Meta derives an estimated \$230 million annually from pro-eating disorder accounts.⁷ Tik Tok bombards young users with eating disorder content in as little as 8 minutes of joining the platform.⁸ Various studies have shown how vulnerable hashtags are exploited by platform algorithms to promote dangerous content including the marketing and recommendation of unapproved appetite suppressants, eating disorders, and self-harm.^{9,10} In one study, vulnerable accounts received 12 times more recommendations for self-harm and suicide than standard accounts.¹¹ Given individuals with eating disorders have 5-6 times greater risk of suicide attempts versus individuals without a history of an eating disorder, the harm these platforms pose to the nation's youth is immense.¹²

To prevent these and other harms, we urge the FTC to move forward with the petition in recognition of the youth mental health crisis and the role of social media design features in that crisis. We would welcome further discussion and questions and can be reached at mgiliberti@mhanational.org and lstine@afsp.org.

Sincerely,



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⁵ Byrne 2021; Zhang et al 2021; Frison & Eggermont 2017; Fardouly & Vartanian 2015

⁶ Fairplay. (2022). Designing for Disorder. Retrieved from https://fairplayforkids.org/wp-content/uploads/2022/04/designing_for_disorder.pdf

⁷ Ibid.

⁸ Center for Countering Digital Hate. (2022). Deadly by Design. Retrieved from https://counterhate.com/wp-content/uploads/2022/12/CCDH-Deadly-by-Design_120922.pdf

⁹ SumOfUs. (2021). Eating disorders, plastic surgery, and skin whitening on Instagram: How young people are exposed to toxic content. Retrieved from <https://cdn.sanity.io/files/k97a60yb/production/579f4d97875580eb08d4c28fe1d123f79d224226.pdf>

¹⁰ Center for Countering Digital Hate. (2022). Deadly by Design. Retrieved from https://counterhate.com/wp-content/uploads/2022/12/CCDH-Deadly-by-Design_120922.pdf

¹¹ Ibid.

¹² Udo, T., Bitley, S. & Grilo, C.M. Suicide attempts in US adults with lifetime DSM-5 eating disorders. *BMC Med* 17, 120 (2019). <https://doi.org/10.1186/s12916-019-1352-3>



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