



February 26, 2024

House Committee on Appropriations
Room 121, House Office Building
6 Bladen Street
Annapolis, MD 21401

RE: HB 1119 “Algorithmic Addiction Fund - Establishment” (Informational)

Dear Chair Barnes and Members of the House Committee on Appropriations:

On behalf of the Computer & Communications Industry Association (CCIA), I write to raise awareness about several points related to HB 1119 in advance of the House Committee on Appropriations hearing on February 28, 2024. CCIA is an international, not-for-profit trade association representing a broad cross-section of communications and technology firms.¹ Proposed regulations on the interstate provision of digital services therefore can have a significant impact on CCIA members.

CCIA holds a firm conviction that children are entitled to a higher level of security and privacy in their online experiences. We appreciate the opportunity to expand upon the efforts CCIA members and industry have implemented to address concerns about younger users’ online use in addition to highlighting some of the current research on the topic of potential mental health impacts.

CCIA members and industry more broadly are actively engaged in various initiatives to integrate robust protective design features into their websites and platforms.

CCIA’s members have been leading the effort to implement settings and parental tools to individually tailor younger users’ online use to the content and services that are suited to their unique lived experience and developmental needs.² For example, various services allow parents to set time limits, provide enhanced privacy protections by default for known child users, and other tools to allow parents to block specific sites entirely.³

This is also why CCIA supports the implementation of digital citizenship curriculum in schools, to not only educate children on proper social media use but also help educate parents on what mechanisms presently exist that they can use now to protect their children the way they see fit

¹ For more than 50 years, CCIA has promoted open markets, open systems, and open networks. CCIA members employ more than 1.6 million workers, invest more than \$100 billion in research and development, and contribute trillions of dollars in productivity to the global economy. A list of CCIA members is available at <https://www.ccianet.org/members>.

² Jordan Rodell, *Why Implementing Education is a Logical Starting Point for Children’s Safety Online*, Disruptive Competition Project (Feb. 7, 2023), <https://www.project-disco.org/privacy/020723-why-implementing-education-is-a-logical-starting-point-for-childrens-safety-online/>.

³ See, e.g., Competitive Enterprise Institute, *Children Online Safety Tools*, <https://cei.org/children-online-safety-tools/>; CTIA-The Wireless Association, *Mobile Parent*, <https://mobileparent.org/>; Software & Information Industry Association (SIIA), *Keep Kids Safe and Connected*, <https://www.keepkidssafeandconnected.com/>.

and based on their family’s lived experiences.⁴ In fact, in 2023, the Maryland Senate introduced SB 799 which aimed at enhancing media literacy skills in young people, including through the requirement to develop and publish a cyber safety guide that, among other things, is used to promote good decision-making when using online media and responsible internet use.

Algorithms are instrumental in providing better-tailored online experiences.

Like any product, there are risks and benefits inherent to algorithmic feeds. However, CCIA cautions against pursuing measures that inherently presume only negative impacts. For example, algorithmic feeds serve content with increased relevance to individual users, prioritizing content that is more likely to be appropriate and of interest. By analyzing past interactions, browsing history, and other factors, algorithms contribute to curating a relevant and personalized experience. While algorithms personalize a user’s experience, they can also help to introduce new topics and interests allowing users to discover creators, ideas, and communities they would not have found otherwise. And algorithms are able to do this efficiently — with vast amounts of content available, algorithms help users navigate information overload through prioritizing content and allowing users to find what they’re looking for faster and with less effort.

Algorithms can also be used to encourage more positive experience online, including through the use of tools to identify and report inappropriate content such as CSAM or guiding users to helpful resources if they search for material related to self harm, suicide, or depression.

Research about the use of algorithms and “addiction” indicates that there is not enough evidence to point to a causal link.

On a daily basis, humans engage in a variety of compulsive and repetitive behaviors — some of these can have decidedly negative impacts on physical and/or mental health. For example, compulsive behaviors could range from binge eating unhealthy foods to exercising in excess to watching favorite shows for hours on end. It is important to consider whether certain compulsive behaviors amount to an “addiction”. *The Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition (DSM-V)* does not include a definition for “algorithmic addiction” or “internet addiction” as it attempts to lay out the distinction between “substance use disorders” and the term “behavioral addictions”. “Behavioral addictions” is used to refer to behaviors such as “shopping addictions”. Such behaviors were excluded from the DSM-V due to the lack of peer-reviewed evidence to establish diagnostic criteria used to classify the behaviors as mental disorders.⁵

There is also a lack of conclusive evidence regarding the relationship between social media use and youth mental health. When the U.S. Surgeon General released an Advisory entitled *Social Media and Youth Mental Health*⁶, many were quick to highlight only the harms and risks that it charged. However, the report is much more nuanced and also discusses many potential

⁴ See *supra* note 2.

⁵ See *Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition*, American Psychiatric Association, at 481.

⁶ U.S. Surgeon General, *Social Media and youth mental health*, U.S. Department of Health and Human Services (May 23, 2023), <https://www.hhs.gov/sites/default/files/sg-youth-mental-health-social-media-advisory.pdf>.

benefits of social media use among children and adolescents. For example, the report concludes that social media provides young people with communities and connections with others who share identities, abilities, and interests. It can also provide access to important information and create a space for self-expression. ***The report further details that the buffering effects against stress that online social support from peers provides can be especially important for youth who are often marginalized, including racial, ethnic, sexual, and gender minorities.***⁷ An online central meeting place where kids can share their experiences and find support can have positive impacts. It should also be highlighted that the report provides evidence that social media-based and other digitally-based mental health interventions may also be **helpful** for some children and adolescents by promoting help-seeking behaviors and serving as a gateway to initiating mental health care.

A study published last year by the National Academy of Sciences, *Social Media and Mental Health*, noted that a literature review “**did not support the conclusion that social media causes changes in adolescent health at the population level**”. The report went on to describe additional nuances related to how certain individuals, such as those with “clinically meaningful depression” may engage with social media in different ways than those who do not. The report went on to highlight “...the relationship between social media use and depression might vary among different demographic or identity groups. Among LGBTQ+ teens, for example, social media use is associated with fewer depressive symptoms but an increased risk of bullying.”⁸ The report goes on to describe approaches, including establishing comprehensive digital media literacy standards in education curriculum, to address the potential harms that certain individuals may experience while acknowledging the complex nature.

Further, the U.S. Surgeon General’s report notes the lack of evidence to support a causative relationship between social media and anticipated negative impacts on younger users. For example, the research openly acknowledges that “...social media use may be a risk factor for mental health problems in adolescents. However, few longitudinal studies have investigated this association, and none have quantified the proportion of mental health problems among adolescents attributable to social media use.”⁹ It is also reasonable to examine that compared to previous decades, young people face increased financial pressure, greater competition, more complex tertiary education pathways, and increased loneliness specifically due to the COVID-19 pandemic. Factors such as increased mental health resources and the general acceptance of having and reporting mental health conditions also play a role. In order to take a measured approach to these complicated and sensitive issues, it is imperative to remember that correlation does not equal causation.

Still other studies point to the nuances of mental health impacts and use of certain online products. This research shows that social media effects are nuanced,¹⁰ individualized,

⁷ Jennifer Marino, Matthew Berger, Megan Lim, Melody Taba, Rachel Skinner, *Social Media use and health and well-being of lesbian, gay, bisexual, transgender, and Queer Youth: Systematic Review*, Journal of Medical Internet Research (Sept. 22, 2021), <https://www.imir.org/2022/9/e38449>.

⁸ *Social Media and Mental Health*, National Academy of Sciences (2023), <https://nap.nationalacademies.org/catalog/27396/social-media-and-adolescent-health>.

⁹ Kayla Tormohlen, Kenneth Feder, Kira Riehm, *Associations Between Time Spent Using Social Media and Internalizing and Externalizing Problems Among US Youth*, JAMA Psychiatry (Sept. 11, 2019), <https://jamanetwork.com/journals/jamapsychiatry/fullarticle/2749480>.

¹⁰ Amy Orben et al., *Social Media’s enduring effect on adolescent life satisfaction*, PNAS (May 6, 2019), <https://www.pnas.org/doi/10.1073/pnas.1902058116>.



reciprocal over time, and gender-specific. Another study conducted by researchers from Columbia University, the University of Rochester, the University of Oxford, and the University of Cambridge found that there is no evidence that associations between adolescents’ digital technology engagement and mental health problems have increased.¹¹ Particularly, the study shows that depression has virtually no causal relation to TV or social media. And, one of the researchers, Professor Andrew Przybylski of the Oxford Internet Institute, stated in a press release, “***We looked very hard for a ‘smoking gun’ linking technology and well-being and we didn’t find it.***”¹²

* * * * *

We appreciate your consideration of our comments and stand ready to provide additional information as the General Assembly considers proposals related to technology policy.

Sincerely,

Khara Boender
State Policy Director
Computer & Communications Industry Association

¹¹ Amy Orben, Andrew K. Przybylski, Matti Vuorre, *There Is No Evidence That Associations Between Adolescents’ Digital Technology Engagement and Mental Health Problems Have Increased*, Sage Journals (May 3, 2021), <https://journals.sagepub.com/doi/10.1177/2167702621994549>.

¹² Regina Park, *The Internet Isn’t Harmful to Your Mental Health, Oxford Study Finds*, Disruptive Competition Project (Jan. 29, 2024), <https://www.project-disco.org/innovation/the-internet-isnt-harmful-to-your-mental-health-oxford-study-finds/>.