Snap Inc.

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Keith R. Krueger, MPA, CAE CoSN Chief Executive Officer 1325 G St. NW, Suite 420 Washington, DC 20005

Barbara M. Hunter, APR NSPRA Executive Director 15948 Derwood Road Rockville, MD 20855

Dear Mr. Krueger and Ms. Hunter:

Thank you for your letter regarding verification and reporting processes for federally recognized K-12 education institutions. We welcome the opportunity to share with you our efforts to combat and report fraudulent accounts on Snapchat. I want to assure you that we take the safety of our user community very seriously.

From the beginning, Snapchat was built as an antidote to traditional social media platforms and designed primarily for talking with close friends — rather than providing an open newsfeed where anyone can broadcast unfiltered content to a wide audience. Snapchat's architecture limits the opportunity for unmoderated and fraudulent content to go viral, which removes incentives for content that appeals to people's worst instincts and reduces concerns associated with the spread of misinformation. Our content platform, Discover, only features curated content from vetted media publishers and content creators. Our entertainment platform for user-generated content, Spotlight, is proactively moderated before content can reach a large audience. We offer Group Chats, but they are limited in size, are not recommended by algorithms, and are not publicly discoverable on our platform if you are not a member of that Group.

Snapchat's <u>Community Guidelines</u> explicitly prohibit spreading false information that causes harm or is malicious, such as denying the existence of tragic events, making unsubstantiated medical claims, undermining the integrity of civic processes, or manipulating content for false or misleading purposes. We regularly review and update our policies as new forms of misinformation become more prevalent: for example, ahead of the 2020 election, we updated our guidelines to make clear that manipulated media (such as "deepfakes") intended to mislead users are prohibited. If we discover false information or content that otherwise violates our guidance, our approach is straight forward: we completely remove it, which reduces the risk of it being shared more widely.

Furthermore, when it comes to harmful and fraudulent content, we do not believe it is enough to think only about policies and enforcement—platforms must consider the impact of their fundamental architecture and product design. By creating designated spaces for high-reach content—subject to curation practices and moderation standards—our platform design mitigates the virality risks of harmful content and creates inhospitable conditions for spreading disinformation to large audiences.

Below please find answers to your specific questions:

- 1. Does your platform allow all federally recognized K-12 education institutions to verify their official social media accounts/pages? If "yes," what is the process for a federally recognized K-12 education institution to get verified on your platform?
 - a. We have established a profile verification process that is open to a broad range of individuals, organizations and institutions. The primary objective of this process as it pertains to public interest and government organizations is identity verification. Education institutions seeking a verified status must create a business profile and must maintain a presence on Snap using a verified email address. Governmental or public interest organizations, including education institutions, will be reviewed for eligibility.
- 2. Does your platform provide a process for reporting fraudulent social media accounts/pages that pretend to represent a federally recognized K-12 education institution? If "yes," what is the process for a federally recognized K-12 education institution to report a fraudulent social media page pretending to represent the institution?
 - a. One of the most important things Snapchatters can do to help keep the platform free of false and harmful content is to reach out to us when they encounter something that makes them uncomfortable, including impersonation which is a violation of our Community Guidelines. One tool we would like to highlight is our in-app reporting tool, which allows anyone to speak up and say something. This tool allows any Snapchat user to easily flag and report concerning or inappropriate content that violate our Community Guidelines and Terms of Service. To report abuse on Snapchat, users can press and hold on the open content until a flag button appears in the bottom left corner which alerts us to their concerns. This report will capture the Snap or Story reported and allow us to more fully assess the situation and take appropriate action such as referring material to law enforcement when appropriate.
- 3. Does your platform provide a dedicated process for federally recognized K-12 education institutions to report social media posts and accounts that harass, intimidate, bully or

otherwise negatively target their students? If "yes," what is the process for a federally recognized K-12 education institution to report a social media post or account that harasses, intimidates, bullies or otherwise negatively targets a student? And how long does it take for your platform to remove a reported post or account?

a. We strictly prohibit bullying, harassment and intimidation on Snapchat and are committed to creating a healthy and positive environment for our community. Our safety teams work 24/7 to review reports made on Snapchat or through our Support Site, and, once reviewed, our safety teams will take action on content that violates our Community Guidelines or Terms of Service. When you report a concern on Snapchat, you will receive a confirmation that your report has been submitted. In nearly all cases, they respond to reports and concerns within 24 hours, the vast majority within a handful of hours, and when users violate our rules, we remove the offending content and may terminate the account.

We also provide an in-app search tool, called <u>Here for You</u>, which shows Snapchatters resources from expert partners when they search for topics related to mental health, anxiety, depression, bullying and more. In addition, our <u>Safety Center contains resources</u> and advice to support anyone being bullied. Within our Safety Center, parents, teachers, and users can find safety tips, research, and resources on how to stay safe on our platform.

Sincerely,

Kip Wainscott

Head of Platform Policy