The Information Futures Lab at Brown University's School of Public Health welcomes this call for public comment on Policy Advisory Opinion 2022-01, addressing Meta's request for guidance on its COVID-19 misinformation policy. What follows is our response to the most significant area of input solicited by the Oversight Board: the need for increased transparency of Meta's interventions and of raw user data that provides potential for greater insight.

Principles and best practice to guide Meta's transparency reporting of its interventions in response to health misinformation.

There is no easy solution to the ever-evolving challenges misinformation poses to public health and safety. The COVID-19 pandemic is not the first significant health issue about which misinformation floods social media platforms, including Facebook and Instagram, and it will not be the last. As Meta continues to find its way toward a solution to misinformation that both honors the principles of free speech while limiting the abuses that accompany it, transparency should be its guiding principle.

Although Meta has implemented interventions designed to limit the negative effects of misinformation, its transparency around the effectiveness of such tactics falls short[1]. Meta should frequently publish the results of its own investigations into the effectiveness of removing content, working with third-party fact checkers, and labeling content deemed potentially harmful. Not only would this assist our ability to make stronger recommendations on its content moderation policies, but it also may increase the level of trust among users, which has

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[1] Windwehr, S. & York, J., Electronic Frontier Foundation, Thank you for your transparency report, here's everything that's missing (October 13, 2020), https://www.eff.org/deeplinks/2020/10/thank-you-your-transparency-report-heres-everything-thats-missing

significantly declined due largely to Meta's lack of transparency around its use of user data[2,3] and the mental health impacts resulting from how its algorithms push content. This is an issue that has been recently addressed by the Oversight Board in the context of political information[4] and it should also be considered in the context of health information.

Beyond the publication of its own investigations, Meta should work more openly with researchers from a wide range of disciplines. They can provide desperately needed context and expertise in the design and evaluation of interventions that are tailored for users around the world who interact with Meta's products in a range of depth, through different cultural lenses, and under varying economic and political environments. For interventions to be trusted and effective, Meta must allow researchers access to key raw data about how interventions are deployed and how users behave after encountering them.

In addition to providing data access to institutions like the Information Futures Lab, whose research centers on creating healthier information spaces, Meta should consider re-establishing its relationship with CrowdTangle, the data analytic tool that many academics, journalists, and activists have long relied on[5] to study misinformation and its impacts. Meta should also expand existing programs such as Ad Library and the Facebook Open Research and Transparency program, and incorporate COVID-19 and health misinformation-related data in these datasets.

[2] Kelly, H. & Guskin, E., Washington Post, Americans widely distrust Facebook, TikTok and Instagram with their data, poll finds (December 22, 20), https://www.washingtonpost.com/technology/2021/12/22/tech-trust-survey/

[3] Ludlow, E. & Molot, C., Bloomberg, One of Facebook's earliest investors says people have lost trust in company (October 13, 2021),
https://www.bloomberg.com/news/articles/2021-10-13/early-facebook-investor-reid-hoffman-says-people-have-lost-trust

[4] Oversight Board, To treat users fairly, Facebook must commit to transparency (September 2021),
https://www.oversightboard.com/news/3056753157930994-to-treat-users-fairly-facebook-must-commit-to-transparency/

[5] Alba, D., Bloomberg, Meta pulls support for tool used to keep misinformation in check (June 23, 2022),
https://www.bloomberg.com/news/articles/2022-06-23/meta-pulls-support-for-tool-used-to-keep-misinformation-in-check

We know that COVID-19 continues to plague all parts of the world as variants arise and misinformation undermines vaccine efforts[6,7,8]. Because one solution cannot fit all users of Meta's products, a nuanced understanding of the value of each type of intervention could go far in limiting the negative health and societal impacts of a Wild West of online content while honoring the rights of individuals to speak their minds and share information. With greater transparency efforts in place, the effectiveness of a wide range of interventions (friction interventions, education interventions, content moderation, etc.) can be better understood and prioritized.

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[6] Chan, E., First Draft, Vaccine misinformation in Papua New Guinea draws on distrust of authorities (April 2, 2021),
https://firstdraftnews.org/articles/vaccine-misinformation-in-papua-new-guinea-draws-on-distrust-of-authorities/

[7] Longoria, J., Acosta, D., Urbani, S. & Smith, R., A limiting lens: how
vaccine misinformation has influenced Hispanic conversations online, First Draft (December 8, 2021),
https://firstdraftnews.org/wp-content/uploads/2021/12/COVID-19_VACCINE_MISINFORMATION_HISPANIC_COMMUNITIES.pdf

[8] Chan, E., Beaman, L. & Zhang, S., First Draft, Vaccine misinformation in Facebook comment sections: a case study (May 6, 2021),
https://firstdraftnews.org/articles/vaccine-misinformation-in-facebook-comment-sections-a-case-study/