MapLight’s Guide to Political Ad Transparency on Facebook, Twitter, and Google

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Can you pose as someone else to post political ads on Facebook? How does Google avoid false or misleading political ads on YouTube? Who are the top political advertisers on Twitter, and how much are they spending? The effects of deceptive digital advertising on elections and politics in the United States are still very much a concern as we head into the 2020 election cycle. In an attempt to address this pressing issue, major social media companies have incorporated measures to increase transparency for political advertising on their platforms. These measures provide useful information—but questions remain regarding how effective they are at combating disinformation and deceptive practices.

In the following guide, MapLight examines the measures that Facebook, Twitter, and Google have taken to prevent foreign or deceptive political advertising and provide disclosure of the interests behind ads. We look at where these measures are succeeding—and the shortcomings that call for stronger policies to ensure true online transparency.

Facebook

Overview: Facebook dominates the market of digital political advertising. Under its system, only “authorized advertisers” can run political ads on its main platform and on Instagram. The company defines political ads as those run by or about current or former political candidates for federal, state, or local office or those that pertain to any election or ballot initiative. Facebook also defines ads that relate to any national legislative issue of public importance as political; these are their version of a category known as “issue ads” under campaign finance law. What qualifies as an “issue ad” is notoriously difficult to define; on Facebook, among topics such as immigration, guns, and taxes, the nebulous term “values” is also listed as a potential trigger. The platform additionally created an ad library, where users can search all active ads and all archived political ads from Facebook and Instagram. All political ads are required to display “paid for by” disclaimers.


Verification System: Individuals wanting to run political ads on Facebook or Instagram in the United States need to provide the company with a residential address and upload an official photo ID. Once an individual is authorized, they can then run ads from any account where they are listed as an administrator, and even create new accounts from which to run ads. Crucially, on Facebook, the individual placing the ad creates the
disclaimer that runs on it. While Facebook says the disclaimer “must accurately reflect the organization or person paying for your ads,” last fall, in the lead up to the 2018 midterms, ProPublica reported that Facebook’s system allowed oil and insurance industry interests to run political ads that appeared to come from neutral sources, while Vice was able to use the write-your-own-disclaimer loophole to run fake political ads under the names of all 100 sitting U.S. Senators. Under both Twitter and Google’s verification systems (see below), running deceptive ads in this manner is much more difficult.

**Ad Library:** Facebook’s ad library lets users search for any ad currently running on the platform and Instagram, and archives political ads dating back to May 2018. The database is searchable by organization, keyword, or individuals mentioned. The company also publishes a weekly ad library report, which shows organizations ranked by the amount they spent that week. Information is also available for download as a CSV file. Clicking on an ad reveals the original disclaimer on the ad, an estimated range of impressions it received, and a rough range of what was spent on it. It also allows an individual to see information about certain demographics that viewed the ad, including age, gender, and location. Notably, on Facebook (as on all three platforms), you cannot see the original targeting criteria for the ad. This leaves significant gaps in understanding advertisers’ intent and the specific audiences reached, allowing harmful microtargeting to run rampant. A recent post on Popular Info, for example, showed how the Trump campaign was running misleading ads to appeal to different age and gender groups—but the extent of that manipulation wasn’t discernible, since the actual targeting criteria were hidden.
Twitter

Overview: Like Facebook, Twitter requires authorization of users who wish to run political ads. Twitter divides political ads into two categories: political campaigning and issue ads. “Political campaigning” includes ads that advocate for or against a clearly identified candidate for federal office, or ads purchased by a political committee or candidate registered with the Federal Election Commission (FEC). “Issue ads” include those that are about any candidates other than those running for federal office, or ads regarding legislative issues of national importance (such as healthcare, immigration, or guns). Oddly, this means that ads advocating for or against candidates for state or local office don’t actually count as political campaigning, but are instead “issue ads.” Twitter also has a political ad archive and requires all political ads to run a disclaimer specifying who paid for them.

Verification System: Twitter has a few different verification processes depending on what types of ads are being run and who is running them. To run political campaigning ads, individuals and
organizations that are registered with the FEC must provide their ID number and a mailing address that matches the one registered with the FEC. Those not registered with the FEC must provide a notarized form including passport information, upload a copy of their passport, and give their mailing address. To run issue ads, an organization must provide its name, mailing address, and U.S. tax ID. An individual needs to provide their name, mailing address, and a photo of their government ID. Unlike Facebook, Twitter states that all handle names must be tied to the certified advertiser. If a handle does not directly reference the advertiser’s name, the bio must contain a disclaimer that the certified advertiser owns it. This makes it more difficult to run deceptive ads under misleading names.

**Ad Transparency Center:** Twitter’s ad transparency center makes it nearly impossible to get a clear picture of the political advertising being run on the platform. While the center shows all promoted ads that have run for the past seven days and archives all political ads, it’s only possible to search by advertiser name. Moreover, the lists of issue advertisers and political campaigners are maintained separately, making it hard to see how much is being spent on the platform, which candidates and issues are being discussed in advertisements, or which advertisers are spending the most. Clicking on a specific advertiser does allow users to see how much they have spent, their website with contact information, and the city and state of the advertiser’s address. Clicking on an ad shows the dates on which it ran; the amount spent on it; impression statistics; and limited targeting information including age range, region, gender, and language.

![Figure 5: Spending, disclaimer, and targeting information for a Beto for America Twitter ad](image)

**Google**

**Overview:** In addition to requiring verification of users who want to run political ads, Google also requires advertisers who want to target users by political affiliation for any reason to undergo a verification process. However, Google defines elections ads more narrowly than Twitter or Facebook do, stating that only ads that feature a current officeholder or candidate for federal office are political—an incredibly limited
definition. All election ads must feature a “paid for by” disclaimer. On Google Search, this disclaimer appears directly on the ad, but on YouTube and display ads, the disclaimer is buried in a separate “Why this ad” section that users must click to access. Like Facebook, Google has blocked political advertising for state candidate and ballot measure races in states with strong disclosure requirements—in this case, expanding the list to include Maryland, New Jersey, and Nevada, as well as Washington.

Verification System: Verification differs for individuals and organizations seeking to buy ads. Organizations must enter their FEC ID if they have one, or input an Employer Identification Number (EIN) with a W-9 tax form or IRS verification letter. An organization representative must provide their name, government-issued photo ID, address, attestation of U.S. citizenship, attestation of U.S. residency, and attestation that the organization can legally run election ads in the U.S. Individuals must provide their name, address, date of birth, social security number, official government ID, proof of citizenship, attestation of citizenship, and attestation that they can run ads in the U.S.

Ad Transparency Center: Google’s ad center shows all political ads since May 31, 2018. Ads may be searched by candidate or advertiser name. Google also allows users to write code to run additional queries on its political data. When users click on an advertiser, they can see the organization’s EIN or FEC ID. This information is particularly helpful, as it allows users to look up an organization’s tax returns and articles of incorporation. Clicking on an ad shows the date range in which it ran and the amount spent on it. However, Google is the only platform where you can’t see any targeting information, though they do provide a summary of total political ad spending by state and congressional district.

<table>
<thead>
<tr>
<th>Advertiser</th>
<th>Amount spent</th>
</tr>
</thead>
<tbody>
<tr>
<td>SENATE LEADERSHIP FUND</td>
<td>$2,692,960</td>
</tr>
<tr>
<td>TRUMP MAKE AMERICA GREAT AGAIN COMMITTEE</td>
<td>$2,879,860</td>
</tr>
<tr>
<td>CONGRESSIONAL LEADERSHIP FUND</td>
<td>$3,782,160</td>
</tr>
<tr>
<td>NRSC</td>
<td>$2,951,260</td>
</tr>
<tr>
<td>Need to Impact</td>
<td>$2,839,450</td>
</tr>
<tr>
<td>NRSC</td>
<td>$2,692,450</td>
</tr>
<tr>
<td>PRIORITIES USA ACTION &amp; IMP</td>
<td>$2,965,960</td>
</tr>
</tbody>
</table>

Format: Image
Amount spent: ≤ $100
Impressions: ≤ 10k
Date range: Nov 5, 2018 - Nov 5, 2018 (1 days)

Figure 6: Top spenders and ad disclosure information in Google’s transparency center
Conclusion
Although we now have more information than ever, political advertising on digital platforms remains far from transparent. Disclosure centers are a step in the right direction, but they are not comprehensive or standardized, creating significant gaps in knowledge. Verification systems continue to be vulnerable to manipulation, as the myriad examples of fake and misleading ads running on Facebook show. The lack of information about targeting criteria prevents voters and election watchdogs from seeing the full picture of how candidates are trying to influence the public and allows harmful microtargeting to continue unchecked. Ultimately, in order to be truly transparent, the platforms will need coordinated disclosure that is mandated by strong policy regulations from lawmakers.