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March 7, 2019

Ms. Eva Guidarini  
U.S. Politics & Government Outreach, Facebook  
575 7th Street NW  
Washington, D.C. 20004

Dear Ms. Guidarini:

On behalf of the National Association of Secretaries of State (NASS), I would like to thank you for your willingness to work with the Secretaries of State, election directors and other important stakeholders to address misinformation and disinformation on your platforms related to the elections process. We believe significant progress has been made to understand and address these issues. As we move into 2019 and the 2020 general election, we urge Facebook to further engage on the following issues:

**First, the elections community faced many challenges as a result of Facebook's use of a non-government, third-party site to prompt users to register to vote.** We instead encourage Facebook to either connect directly to the chief state election webpages, state online voter registration system webpages, and/or [vote.gov](https://www.vote.gov). These government-backed websites will provide accurate information to the public, eliminating confusion and frustration in the voter registration process. As we have previously discussed, in the 2018 midterm election cycle, a non-government, third-party site failed to properly notify users of incomplete voter registration applications initiated through their site. Many of these individuals then went to the polls and quickly found out they were not registered. This incomplete process was not effectively addressed by the third-party platform or Facebook at the time. Moving forward, we would like to avoid future issues of this nature.

**Secondly, Facebook's "community standards" were ineffective when addressing reported election mis/disinformation.** Leading up to and during the 2018 midterm elections, state and local officials reported mis/disinformation directly to Facebook. The ease of reporting was appreciated, but in some cases the reported mis/disinformation was not taken down, causing the perpetuation of false information and distrust in the platform as a source of reliable information. The frequent response from Facebook was the mis/disinformation did not violate your



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community standards and/or cause voter suppression, with no further explanation. Secretaries of State and their staff often appealed this decision, but to no avail. Transparency and consistency in the reporting process is crucial to ensure accurate information in the public domain to instill voter confidence.

**As election officials and the federal government continue to fight mis/disinformation around elections, we believe it would be beneficial for state and local election officials to give direct input on your platform's community standards.** Election officials have first-hand knowledge of false claims (past and present), and a strong familiarity with state laws, campaigns, candidates and politically active local organizations. Advisement on Facebook's community standards could include establishing a working group of Secretaries of State, election directors and their communications directors. NASS would be happy to help facilitate this working group.

Again, NASS and its members appreciate our continued positive working relationship with Facebook. I look forward to your consideration of these requests as we all prepare for the 2020 elections. In the interim, if you or your staff have any questions please feel free to contact NASS at 202-624-3525, or [mbenson@sso.org](mailto:mbenson@sso.org).

Sincerely,

Hon. Jim Condos

NASS President and Vermont Secretary of State

cc: Committee on House Administration  
U.S. Senate Committee on Rules and Administration  
The U.S. Election Assistance Commission  
The Department of Homeland Security  
The National Association of State Election Directors