



“THE ONLY PEOPLE THAT GOT HURT WERE THE SMALL GUYS”:

Assessing Winners and Losers from the 2020 Platform Political Ad Bans

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Executive Summary & Recommendations

Responding to calls to take more aggressive action to prevent misinformation on their platforms, several technology companies instituted significant changes to their political ad policies ahead of the 2020 election. For instance, Facebook stopped accepting new ads in the final week of the general election, and Google and Facebook both banned all political and social issue ads from November 4th through the middle of December. These reforms followed political ads bans by Twitter, Amazon, Spotify, TikTok, LinkedIn, and Pinterest.

As we approach the 2022 midterm elections, platforms are faced with a critical question: did the political ads bans work? To make informed decisions about optimal government and platform policies for future elections, it is critical that we understand the impacts of policy experiments during the 2020 elections. Facebook and Google's 2020 policy changes offer useful cases for understanding how shifts in platform political ads policies can influence elections. Analyzing available Federal Elections Commission data, data from platform ad archives, and a set of 22 interviews with political candidates and digital ad strategists, this brief offers the first systematic assessment of the impacts that Google and Facebook's bans had on campaign spending, strategy, and ad content. This is the second in a [series of policy briefs](#) on political ad bans from the Center on Science & Technology Policy.

Our empirical analysis found:

- **There is little evidence that either ban meaningfully reduced the impact of misinformation.** In fact, the bans may have been counterproductive by making it harder for committees to address misleading organic content. While it may not have meaningfully reduced misinformation, Facebook's ban on new ads likely altered the substance of political ads by encouraging more evergreen content during the last week of the election.
- **The bans likely hurt poorer campaigns more than wealthier ones.** Both bans required innovation in ad spending that benefited wealthier campaigns. Campaigns with more limited financial resources were less likely to have the labor, expertise, and networks to navigate the uncertainty and disruption created by the bans.
- **The bans likely hurt Democrats more than Republicans.** Because Democrats have tended to rely more heavily on Facebook ads than Republicans for small-dollar donations, collecting voter data, and mobilization, it is likely that the ban disproportionately disrupted Democratic campaigns.

Based on these findings, we offer the following five recommendations:

- 1. Platforms should permit political ads for the upcoming 2022 midterm elections.** Paid political speech is a valuable channel for democratic debate. While further study is needed, our analysis finds that banning political ads may not yield the promised benefits. We also recommend that the government make it easier for a wider range of platforms, particularly smaller platforms, to run political ads. For example, the FEC should release additional guidance on political ads so that platforms have clarity on the compliance measures they need to implement to minimize the legal and reputational risk of running political ads.
- 2. Platforms should provide advertisers with more time and resources to navigate political ads policy changes.** Platforms should announce any political ads policy changes for the 2022 midterms no later than May 8th, 2022, six months before election day. After that date, platforms should operate with the presumption that there will be no policy changes, although that presumption might be overridden by exigent circumstances.
- 3. Platforms should conduct due diligence on changes to political ad policies.** Before making significant political ads policy changes, platforms should conduct political advertising impact assessments to anticipate the impacts that policies may have on elections, paying special attention to how policy changes could affect different parties and campaigns. Platforms should also release impact reports, done 6-12 months after the policy takes effect, that evaluate the costs and benefits of the policy intervention, recommend whether the intervention be continued, and include options for mitigating costs. We also recommend that platforms include information about content enforcement and action against political ads in their transparency reports.
- 4. Platforms should apply to paid political content *at least* the same standards and enforcement practices as to organic content.** For example, if platforms choose to label organic content deemed false by third-party fact checkers, they should *also* label paid content deemed false by third-party fact checkers. Paying for content should not exempt an advertiser from content moderation.
- 5. Congress should criminalize the dissemination of misinformation intended to suppress the vote.** Passing a bill such as the Deceptive Practices and Voter Intimidation Act — introduced by then-Senator Barack Obama in 2007 and included in the For the People Act of 2021 — would achieve this objective.

Background

On September 3rd, 2020, Mark Zuckerberg [announced](#) in a Facebook post that the company would stop running all political advertisements on October 27th, one week before the end of the US general election. Ads that had already been submitted, approved, and viewed at least once could be re-activated and re-targeted. Although some countries prohibit political ads in the days before an election, this action was an unprecedented policy experiment by the largest provider of digital political ad space.

Soon after, both [Google](#) and [Facebook](#) announced that after November 4th, they would no longer run any political or social issue advertisements. While many interpreted this as an effort to limit false claims about election fraud and voter irregularities in the wake of the election, the new policy resulted in a significant disruption for the runoff election held on January 5th, 2021, for both of Georgia's senate seats. While both companies restarted political ads in mid-December, this policy—as Facebook's policy in the general election—amounted to a radical experiment in limiting digital political ads by two platforms that until [recently received more than 77% of digital political ad spending](#).

These policy interventions came on the heels of total bans on political advertising during the 2020 cycle by digital platforms, including Amazon, Spotify, LinkedIn, Pinterest, and TikTok. Notably, several other platforms, including Snapchat and Reddit, continued to run political ads throughout the election.

Looking forward to the 2022 midterm elections, Google and Facebook's recent policy experiments provide important insight into the impacts and implications of platform political ad bans more broadly. While Facebook's ban on *new* ads in the general election is notably different from other bans on *all* ads, it still can provide a look at how committees and advertisers respond to major disruptions on political ad platforms.

For our analysis, we asked three main questions:

1. How did the bans impact political ad spending and strategy?
2. How did the bans impact the content of ads?
3. Did the bans have consistent impact across different campaigns, parties, or committees?

Methods

[In a previous brief](#), we outlined some of the challenges of assessing the impact of recent political ad bans. Holes in FEC and platform ad archive data make it difficult to understand if and how committees moved money in response to the bans. While there are similarities across elections, each major cycle is unique. Presidential and midterm elections not only see widely different amounts of money spent but also different strategies and tactics used. In the four years between presidential elections, there are often radical changes to ad and media technologies and how campaigns use them. But there are also significant differences in the politics of different elections cycles: different candidates not only aim to mobilize different voter populations but structure their campaigns and spend their money in diverse ways.

Most notably, holding a major election during a global pandemic had a profound impact on campaign strategy. The pandemic forced [many campaigns to limit in-person campaigning and canvassing](#). While the political ad bans may have altered campaign spending and strategy, it was difficult to identify those impacts within data that also showed significant differences due to new technologies, new campaigns, and the pandemic.

Despite these methodological challenges, by triangulating our analysis across different data sets we identified some of the influence these two bans had on campaign spending, strategy, and advertising (see Appendix A for a full description of our methods).

First, we completed 22 interviews with a variety of campaign strategists, communication consultants, and political candidates. See Table 1 in the methodological appendix for a breakdown of interview subjects. We asked interview subjects about their experiences dealing with platform political ad bans in the 2020 general election and the Georgia runoff on January 5th, 2021 (when applicable). To preserve source anonymity, participants were not listed by name, but were instead identified by a number corresponding to entries in Table 1 in Appendix A. While we reached out to both Democrats and Republicans, as seen in Table 1, more Democrats agreed to participate in interviews.

We combined interviews with data on committee spending from the Federal Election Commission. All political committees (this includes campaign committees, political action committees, and non-profit 501c4 organizations) are required to report how they spend money during an election cycle. We collected FEC data for the final months of the 2020, 2018 and 2016 elections that were specifically described as being for advertising. We hand coded that data, separating that which was paid to communication agencies and to advertisers directly, as well as categorizing spending into broad

categories. See the methodological appendix for a more detailed description of our search terms and methods.

We also collected data from platform political ad archives. Facebook, Google, Snapchat, and Reddit maintain such archives. As discussed in our previous brief, these archives have significant limitations. As one way of dealing with Facebook API limitations, we sampled 10% of US House districts and collected both winners and losers in both 2020 and 2018 (the ad library does not include 2016).

Finally, we analyzed metadata about fact checks included in the ClaimReview archive. ClaimReview is a formatting standard used by many—but not all—fact checking outlets, that allows fact checks to be easily archived and searched. Google maintains a database of these fact checks.

Findings

There is little evidence that the bans reduced misinformation, but Facebook's action encouraged advertisers to run more generic ads

No Indication of a Change in Content Accuracy

Facebook justified the ban on new ads in the general election by suggesting it would prevent or limit the amount of misinformation circulating at the end of the election. The platform prohibited false information about voting processes and requirements, but it did not fact check ads more broadly, meaning there was nothing to prevent an organization from uploading false ads in the days before the ban took effect. While [Facebook claimed](#) the ban would permit “fact-checkers and journalists” to “scrutinize” ads loaded into the library, fact checkers rarely assess political advertisements. For example, PolitiFact, a prominent American fact checker, maintained an [“Ad Watch”](#) during the election, that synthesized all the fact checks it did of political ads. By the end of the general election, it included only 7 entries.

A broader review of all the fact checks included in the ClaimReview archive underscored how rarely political ads were subject to a fact check. Searching all fact checks in the final month of the election for the key word “ads” or “advertisement” returned only 9 entries, none of which assessed ads on Facebook; only fact check ran in the final week.

These data are similar to strategists’ perceptions of the impact the ban had on misinformation, as one reported:

“Honestly, I think it’s bullshit. I don’t think anybody is going in there [Facebook’s ad library] in the seven days before looking through all of those ads and fact checking them ... I don’t think any of that honestly happened and I truly do believe that Facebook was doing it to kind of save face and say: “Look, we did something, you can’t blame us any longer because we did a thing” (3).

As discussed below, the ban meant that ads for the end of the election were uploaded over a shorter timeframe, potentially making it even *more* difficult for fact checkers, campaign staff, or journalists to wade through the thousands and thousands of ads uploaded into the archive.

In addition, some advertisers appeared to have shifted spending from Facebook and Google to other platforms (especially in the Georgia runoff). Notably, programmatic display ads placed through demand-side platforms and ad exchanges have little transparency. Not only did this make it difficult to assess if and how the content of ads shifted, but also left open the possibility that advertisers simply moved false content to alternative platforms.

Importantly, we did not attempt to assess the facticity of Facebook or Google ads in the election. At the same time, despite new interest in misinformation in political ads following revelations about [foreign state actors placing misleading ads in the 2016 election](#), there remain few efforts to [systematically review the facticity of digital political ads](#). While there has recently been more scholarship on digital political ads—especially in the wake of Cambridge Analytica and the creation of platform political ad archives—[there remains much we do not know](#). There is some indication that Facebook [ads are less negative than TV ads](#), however, it would be beneficial to understand how commonly false claims occur, the types of false claims that predominate, the types of committees most likely to spread false claims, and the amount of money spent on falsehoods.

Most of the strategists interviewed indicated that they believed misinformation in organic content on Facebook was a bigger issue than in paid media. As one strategist explained: “I was more frustrated with them [Facebook] on an organic perspective. Because, great, yes, you can shut down ads. But that does not shut down people from posting misinformation. It doesn’t shut down people from claiming he [Trump] won. It doesn’t shut down those things” (3).

However, bans limited the ways committees responded to organic misinformation directed at them. Many smaller or non-incumbent campaigns may have lacked the organic reach to ensure that responses to misinformation were widely seen. For those campaigns, paid media could be a way to make up the difference in followers or distribute content to other audiences they could not otherwise reach. Rather than

limiting misinformation, some informants, like a GOP campaign staffer, indicated that bans limit “advertisers’ ability to adapt and respond to organic disinfo” (4).

Ultimately, some informants described the ban as some sort of “publicity stunt” (13), “vanity play” (3), or an effort “in some way for them to cover their asses” (8). One Republican strategist said, “I think everyone viewed it as what it was, it was a way to sidestep having to make difficult decisions about Trump in the last seven days of the campaign”. The strategist continued that misinformation is “not something that they’re trying to address seriously. So I just don’t take anything that they say as a good faith effort” (4).

The Ban Encouraged More Evergreen Content

Despite limited evidence that Facebook’s ban reduced misinformation, it did appear to have changed the content of political ads by encouraging more evergreen and less-specific content (see Figure 1). In previous elections, committees ran [detailed digital ads in the final week to encourage turn out](#). One strategist explained: “There’s research to indicate that if somebody sees an ad and it says, ‘Election Day is tomorrow,’ they will maybe feel more of a sense of urgency than if they see that, like ‘the election is like coming up very soon, or like the election is November 3’” (20).

However, because the ban compelled advertisers to upload ads at least one week in advance of the election and because Facebook prohibited false information about voting logistics and processes, several (Democratic) informants indicated they were concerned ads with detailed information about voting would not be approved. For example, if a campaign tried to upload and run an ad on October 25th that said “Today is the last day to vote” so that they could re-activate it the following week, according to Facebook’s policies the ad would be rejected for being false.

With the stakes high in the last week of the election, several Democratic informants suggested that, as one said, “I want[ed] to make sure our ads are up, I don’t want them to get taken down for any reason.” Rather than risk having ads rejected and wasting the time and money to produce and upload those ads,

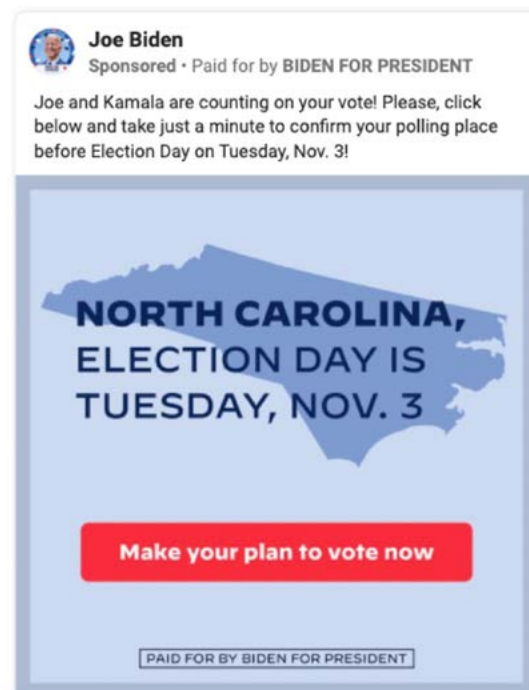


Figure 1. Facebook advertisement that ran during the last week of the election.

they “just kind of continued with more evergreen, less specific creative, capitalizing on this sense that the election is very soon, but without the specificity” (20).

The bans likely hurt poorer candidates more than wealthier ones

While much about digital political ads remains unclear, existing empirical scholarship suggests [“the most financially constrained candidates rely on Facebook more, relatively speaking, than candidates with typically less binding financial constraints.”](#) The same appears to be the case for down-ballot races, where [“less than 10% of state house and senate candidates advertised on television, whereas closer to 40% advertised on Facebook.”](#)

Our data indicated that bans hurt poorer campaigns more than wealthier ones. One NC state-level political candidate said that he believed that Facebook

“made all of their decisions only thinking of big, expensive national attention type of campaigns. And when they did that, they gave no consideration whatsoever for small campaigns, which is the vast majority of campaigns going on across the country during an election. That’s who got held back. They were never even considered when the rules were put in place (14).

The bans limited an avenue of paid political speech used more by poorer and down-ballot races. However, well-funded campaigns across the ballot were better able to deal with the disruption presented by the Facebook’s policy experiment. Similarly, the huge amount of money in the Georgia runoff likely mitigated what would otherwise have been much larger impacts of the Facebook and Google bans. We saw this disparity playing out in three main ways: how the bans compressed the timing of ad spending, how they increased uncertainty, and how they required innovation in ad strategy and spending.

The Ban Compressed the Timing of Ad Spend

One of the most apparent impacts of Facebook’s ban on new ads in the general election was altering and compressing the timeline for digital ad spending in the last weeks of the election. Campaigns have a [“strategic temporality”](#) or a [“temporal logic, communications are often planned in advance, and staffers have a holistic messaging strategy that proceeds in time.”](#) The ban “shortened all that timeframe and moved it back” (8), by forcing advertisers to make sure that all of their Facebook ads for the last week were uploaded by October 26th. This “sort of meant that the push for election day got moved up a week earlier” (21), as advertisers needed to have all ads approved and in the system.

Facebook ad library data (Figures 2a & 2b) show that both total spending on ads and the number of new ads placed peaked in the week before the ban took effect, before dropping dramatically in the final week. Advertisers “submit[ed] every ad we might want” (5) in the final week of the election. Others uploaded what one strategist called “back-up sets” to give themselves options for what to run in the final week. Advertisers “had to really think through a lot of different scenarios, so that we could potentially be ready for anything” (3). See Figure 3 for an example.

Interestingly, while several interviewees suggested the time compression created additional work and stress several weeks before the end of the campaign, three saw this as a *benefit*. One Democratic consultant observed that “it kind of forced some better planning” (5); another noted it was “a little bit of a reprieve” (21) in what is otherwise an incredibly hectic time in a campaign.

Even still, there was reason to suspect that this time-contraction advantaged better-funded campaigns and advertisers. Better-funded advertisers were not only able to pay for help navigating the new and unfamiliar policy, but they were also able to spend the money to create additional ads and make sure that they were uploaded ahead of time. One strategist who worked both on large and small campaigns noted, “for our smaller campaigns. We had to be a little bit more nimble and just run maybe one or two pieces of creative that we knew we would need in those final days” (3).

Smaller and/or poorer campaigns might not have had the resources necessary to develop “backup sets,” nor to pay consultants to ensure that all the work was done ahead of time. One state-level candidate said, “the only people that got held up [by Facebook’s ad ban] were people who couldn’t afford to hire people or didn’t have the volunteer base that I ended up getting. So again, the only people that got hurt were the small guys” (14).

Both Bans Increased Uncertainty about Ad Policy

Facebook announced its significant ads policy change only six weeks before a highly contentious election. One GOP strategist reflected that “it’s unfortunate that we were kind of the guinea pigs of it all, especially whenever tensions are so high” (12).

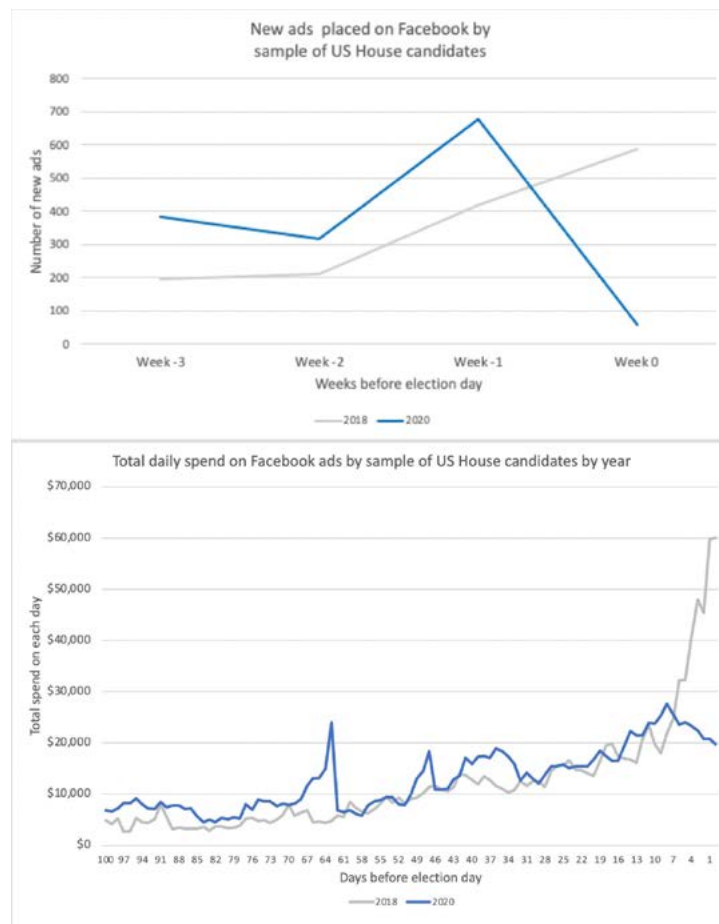
As digital and campaign strategists learned of these policies, many either did not understand nor agree with the rationale for the ban. One Democratic strategist said, “I do not understand what [Facebook] was hoping to achieve” (5). Another said they saw that “There was no logical reason behind a week-long ad ban when Facebook has known full well that the problem is with organic posts, not with paid media” (13).

Furthermore, Facebook’s roll-out of its ban on new ads in the general election did not go smoothly. One Democratic strategist remembered that, “when it actually hap-

pened, the rollout was horrible. It was absolutely terrible. We were not live on Facebook for two days in the critical final week, which is just unacceptable” (3).

While Facebook deactivated all political advertisements from October 27th, it had intended to allow ads that had previously been submitted, approved, and had had at least one impression to be re-activated. Informants, however, reported issues both having ads approved in the days before the ban and reactivating ads in the days after. One consultant from a large Democratic agency (13) estimated that there were problems approving or reactivating as many as 70% of their ads—a problem Facebook told them and at least one other informant was “a glitch” (21).

Some saw their advertisements rejected after being incorrectly classified. One Democratic strategist said Facebook informed them it rejected an ad for a gay candidate because it ran afoul of prohibitions on ads for mail order brides (21).



Figures 2a & 2b. 2a shows the total number of new ads uploaded to the Facebook ad archive in the weeks before the 2020 and 2018 elections. Data are from the winners and losers of a randomly selected sample of 10% of congressional districts. 2b shows the average daily spend on ads from the same districts.

Inactive
Oct 25, 2020 - Oct 26, 2020
ID: 675490853402044



Figure 3. Facebook ad library entry for Trump campaign ad uploaded on October 25th that ran for one day before the ban took effect.

political ads, “you saw just how capricious Facebook is and how they come up with and enforce these policies” (4).

Another GOP consultant indicated that Facebook and Google’s bans “definitely left me with a sense that anything is possible, and you sort of expect the unexpected, but you don’t know how those things would play out” (16).

This sort of uncertainty was particularly unsettling for smaller campaigns that might not have the resources to pay expensive consultants or even dedicated digital ad staffers who could help them plan how best to navigate an uncertain policy terrain.

Larger and better funded campaigns also tended to have [better access to platform](#)

All of the informants who had problems with ads reported that the issues were resolved within 48 hours. However, missing advertising time in the final week of the election, when organizations usually spend substantial amounts of money on get-out-the-vote messaging, meant a significant disruption. “When you’re spending at that level ... and you’re targeting five swing states or something, missing a day of creative is like, hundreds of thousands, if not millions of impressions, and you can’t get that back” (13). That sort of disruption was especially damaging for smaller campaigns, which were less able to make up for the loss of impressions with other media.

At the same time, the bans showed that Facebook and Google were willing to experiment with somewhat-radical policies even in extremely sensitive moments. Nearly half of our interviewees indicated that this experience has created a great deal of uncertainty about future elections. Several wondered if this was “maybe the first step of them [Facebook] getting out of the political game” (8). But even if Facebook continues to run po-

[representatives](#). This meant that while some informants heard about the policy change from Facebook and Google representatives, one described reading about the policies on news sites:

“ I often times felt like I was hearing about their changes in the news and wasn’t hearing as direct communication about changes, and I don’t know why that was the case. You know, we spend a lot of money with both of them, but often times, I felt like with the Facebook ad changes, it was like, I’d read about it, and then I’d have to follow up with people at Facebook (16).

Smaller campaigns—especially smaller state and local campaigns—often relied heavily on party infrastructures. While this brought advantages, it also left campaigns less flexible and less able to quickly deal with unforeseen challenges. One example is telling. While it restarted some in-person outreach in mid-October, the North Carolina Democratic Party [suspended most in-person canvassing in response to the pandemic](#) following the March primaries. This left candidates who wanted to do in-person canvassing having to build a system on their own. One NC state representative (18) said that in response to Facebook’s policy, they felt they should increase canvassing in the final week to help motivate turnout. However, they found little help from the state party. While this representative’s experience seems somewhat unique, it does, at a minimum underscore an additional way that poorer campaigns can be disproportionately affected by such policy experiments.

Both bans required innovation in ad spending that benefited wealthier campaigns

Deep pockets helped make it easier for campaigns to navigate the Facebook and Google bans, as illustrated during the Georgia runoff. Because the winners of the runoff would decide control of the Senate, committees were able to raise huge amounts of money. This money permitted campaigns, agencies, and other committees to experiment with new ad venues and to flood the market with ads across media, which one consultant said turned a major disruption into a “blessing in disguise” because they were able to expand their buy “beyond the walled gardens of Facebook and Google” (15).

According to the consultant, the Facebook and Google bans in the runoff “forced us to think a bit more. It made us be a little more creative” (5). One Democratic strategist said, “we got to the point where we were literally trying to turn over rocks and figure out what was there” and spend money in places that “in a normal budget world, you’d cut all those out and leave more room for YouTube and Facebook” (7). Notably, the ability to look for creative solutions to the bans was supported by unprecedented fundraising for the runoffs, which gave advertisers the freedom to experiment.

Interviewees reported that during the Georgia runoffs they shifted money to direct ad buys with prominent digital media channels, such as BuzzFeed, Hulu, or Roku. In interviews, two strategists suggested they moved money that would have been spent on Facebook and Google ads to Snapchat. Judging by Snap’s archive, we estimated that about \$1.5 million was spent on Georgia-related ads during the runoff (for comparison, about \$12.8 million was spent on Snapchat by all spenders in last two months of the general election).

Interviewees suggested they also shifted money to some smaller Georgia-focused outlets, “Like niche audio vendors that had some more influence into black media” (7). FEC data identified several of these, including the blogs “[Fearlessly Oma](#)” and “[Naturally Kam](#)” which were paid \$1500 and \$700 respectively by MoveOn.org during the first half of December.

Relatedly, interviewees and FEC data indicated that Democratic campaigns and committees also paid or partnered with influencers. This included well-known celebrities, like John Legend, whose “organic” posts reached voters across Georgia and the US, helping drive donations. The involvement of celebrities was a huge advantage that as one consultant noted, “if you had to pay for that, that will cost a fortune, you’d never do it” (5). This effort also included national influencers like the YouTuber, Kim Thai, and what one strategist called “micro-influencers,” an approach that was “ripped right from the brand world” (11). Judging by FEC data, many of these influencers were either located in Georgia, had large African American followings, posted lifestyle-related content—or some combination of the three. For example, MoveOn.org paid Evani Hawkins, who runs the lifestyle and beauty-focused YouTube channel [eVaniwithaV](#), and who self-identifies as being from “Metro Atlanta,” \$1,100 between 12/19 and 12/22 for digital ads.

Facebook’s ban on new ads in the general election also motivated innovation in ad strategy and spending. Available data indicated that less money was spent on Facebook ads in the final week of the general election than would have likely been spent without the ban. Facebook ad library data showed an increase in the number of ads and the spending on ads in the week before the ban took effect in 2020, but then a large drop occurred during the final week. In 2018, campaigns in the same districts continued to spend money on new Facebook ads throughout the end of the election. FEC data tells a similar story. There was a 15% decrease in Facebook spending between the first two and last two weeks of the last month of the 2020 election. In 2016 there was a 105% and in 2018 a 325% increase over similar time frames.

For the first two weeks of the last month before the election, the spending in 2018 and 2020 was similar. In week three (the week in 2020 before the ban went into effect) sampled campaigns spent an extra \$30,000, but then spent about \$160,000 *less*

in the final week (see Figure 4).

While limits in available data meant we could only get a partial view of how this money was reallocated, we were able to draw some conclusions.

FEC data showed a nearly 200% increase in spending on Google ads in the final week of the 2020 election. This was larger than in 2018 (%+139), and in 2016—the last presidential year—which saw a decrease in Google ad spending in the final week (-60%). Notably, radically different amounts of money were spent on Google ads in each election. Available FEC data suggested about \$31.5 million was spent on Google ads in the last month of the 2020 election. In 2016 it was \$1.8 million (see Figures 5a & 5b).

However, Google’s ad archive did *not* show an unexpected increase in the final weeks of the 2020 election. Indeed, Google’s archive showed a *smaller* increase in the final weeks of the campaign in 2020 than in 2018 (Google +48% in 2020 and +108% in 2018).

While there was danger of over-interpreting these data, one possibility was that committees who bought their own ads without going through an agency switched some money to Google that they would have likely spent on Facebook. In contrast, those who placed ads through agencies, [which accounted for the vast majority of advertising spending in the last month of the election](#), shifted money elsewhere.

Google severely limited targeting of political ads in 2019, undercutting their utility as compared with other available options. Those other platforms, however, can be difficult to use. Google, like Facebook ads, are relatively simple to use for campaign staff at smaller or less well-funded organizations who may have less experience with digital ads and less time to invest in executing ad buys.

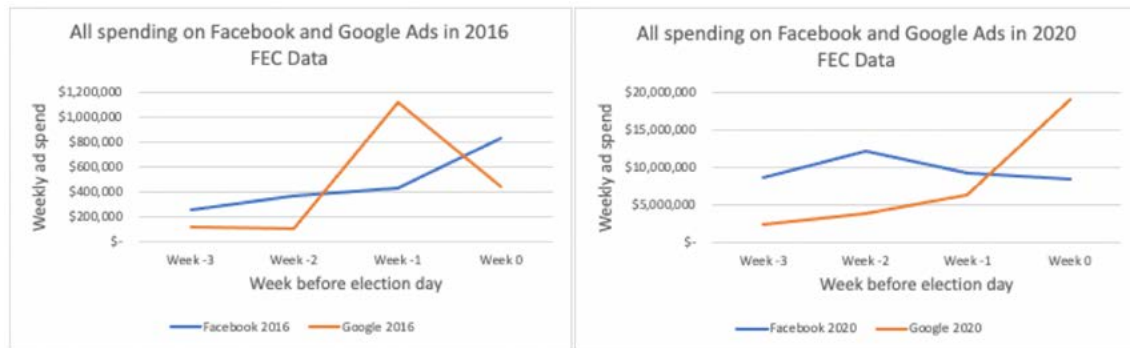
Interviewees identified two other places where they shifted money in response to Facebook’s ban in the general election. As in the Georgia runoff, several informants

Weeks before election	2018	2020
Week -3	\$ 110,434	\$ 114,901
Week -2	\$ 130,294	\$ 132,057
Week -1	\$ 153,384	\$ 185,487
Week 0	\$ 342,791	\$ 180,190

Figure 4. Total spending by sample of US house candidates from same districts in last four weeks of 2020 and 2018 elections.

indicated that they shifted some money to Snapchat. However, neither FEC data nor Snap’s own archive, however, supported that this happened on any significant scale. Snap’s archive also shows a smaller increase in the final weeks of the general election in 2020 than in 2018 (Snap +85% in 2020 vs 418% in 2018). FEC data similarly shows no indication of an increase in buying Snapchat ads in the last weeks of the campaign in 2020.

Programmatic ads bought through demand-side platforms (DSPs) may have provided the best alternative to Facebook in terms of targeting, modeling, list matching, and inventory, but were more complicated to use than Facebook or Google. DSPs allowed advertisers to purchase inventory from ad exchanges that included display, streaming (aka over-the-top or OTT) and connected-TV ads (CTV).



Figures 5a & 5b. Total amounts spent on Facebook and Google ads in last four weeks of 2016 and 2020 elections for both committee dispersments and independent expenditures by all committees included in FEC database. Notably these data *did not* include all the money spent by ad agencies on behalf of committees—as much as [93% of all advertising spending](#).

Several interviewees indicated that “programmatic platforms have been a big winner with a lot of the rule changes” (16). However, data about DSPs was extremely limited. To the best of our knowledge, none of the major DSPs maintained a political ad archive. At the same time, one GOP consultant noted, “down ballot candidates in smaller campaigns don’t have access to those resources [programmatic ads], unless they’re buying through an agency like us” (19). Purchasing and targeting programmatic ads through DSPs were more technically difficult than through Google and Facebook. Smaller campaigns—especially local or state campaigns—may have lacked the expertise needed to not only purchase these ads, but to bring in the data and voter lists that allow an advertiser to get the most use of them. Indeed, several informants noted that list matching on DSPs could take weeks as opposed to hours on Facebook. This meant that not only did advertisers need to have the foresight to start the switch to programmatic display ads weeks in advance, but they needed the technical understanding of how best to use them.

The bans likely hurt Democrats more than Republicans

While little empirical insight into political ads in the 2020 elections currently exists, studies of earlier elections suggest Republicans and Democrats have used digital ads differently. Over the last several cycles, the [two parties have](#) had [notably different](#)

[digital infrastructures and strategies](#). More recently, [scholars have noted](#) a persistent difference in digital ad content between Republicans and Democrats in the 2018 mid-terms.

Acknowledging that the overall impact on election outcomes was likely small, there was some evidence that the bans hurt Democratic campaigns and committees more than Republican campaigns and committees. Data and interviews indicated three reasons why the bans likely harmed Democrats more than Republicans.

First, [politically conservative posts often led impressions and reach on Facebook](#). This meant that some on the left felt they needed to rely more heavily on political ads to make up the difference. One Democratic consultant said:

“And then if you look at the organic posts, like the organic reach on Facebook, nine out of the top 10 are consistently conservative Republican, Donald Trump specifically, or like, Ben Shapiro, or other kind of like right wing groups. And what’s sad is that the only way to combat that is through paid promoted posts. And it kind of creates an arms race, and it’s hard to battle the disinformation. And we have to keep giving money to this [paid content] (8).

Our Facebook ad library data, comparing a sample of Democratic and Republican losers and winners from the same set of districts in 2018 and 2020 showed that Democrats in the sample spent more on Facebook ads than Republicans—about 50% more in 2018 and 43% more in 2020 (see Figure 6).

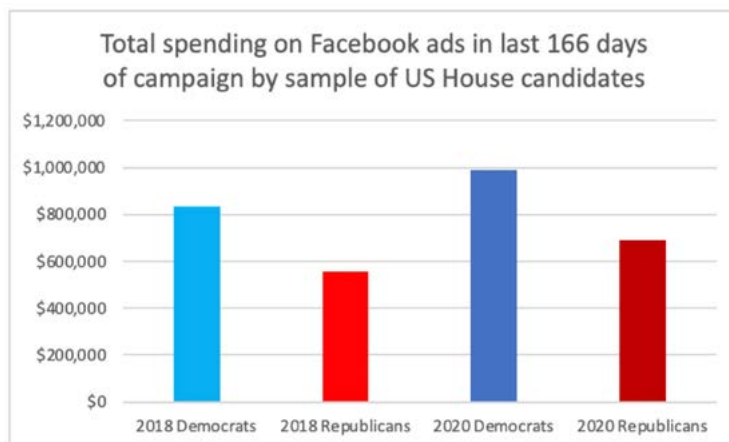


Figure 6. Total spending by a sample of Republican and Democratic congressional campaigns in 2018 and 2020 over the last 166 days of each election.

As discussed above, while there is little reason to believe the bans had significant impact on the misinformation contained on the platforms, they reduced the ability of campaigns to *respond* to mis- or disinformation in either organic or paid content. This meant that Facebook’s ban left Democrats concerned that they would be less able to respond to organic conservative content through paid advertising in the final week of the election.

Second, interviewees suggested that Democrats and Republicans used Facebook and Google ads differently in the 2020 elections. Several strategists said that Democrats relied more on Facebook for small-dollar donations than Republicans. [Data collected by OpenSecrets](#) supports this, showing that that on average about 33% of donations to federal Democratic candidates in 2020 were from individuals who contributed less than \$200, while for Republicans it was about 17%. While these data do not specify the origins of those contributions, fundraising on social platforms often results in smaller donations.

One Democratic strategist working in the runoff observed that, “we really found that there was no replacement for Facebook on the fundraising side in terms of the revenue” (7). The same was true of Democratic efforts to use Facebook and Google to build email and phone lists of supporters. Unable to find a similar alternative, “we ultimately moved away from ads into more fixed cost [options] and invested in the email list in other ways. But, it was sort of a reality that there wasn’t another Facebook.”

Interviewees suggested that Democrats have also recently relied more on Facebook for voter mobilization. And while the expansion of early voting has meant the last week is less important for mobilization—and indeed [more Republicans voted on election day than Democrats in 2020](#)—restricting a key component of digital mobilization efforts in the last week might have hurt Democrats more than Republicans. One GOP strategist said:

“I think it [the Facebook ban] hurts Democrats more than it hurts Republicans, because you know, our voters are older, we can still reach them with phones and broadcast television cable, they’re pretty stable with their address so we can get them with mail; p2p [peer-to-peer] texting works really well. It’s the younger voters who are mostly online and by the way, lower propensity voters. So voters who don’t turn out as often typically are sort of turnout targets for Democratic campaigns. They’re more online, they’re more likely to rely on word of mouth and social media for political information (4).

Our Facebook ad library data showed that there was a marked increase in daily spending for Democrats in the last week of 2018 election—likely indicative of a last-minute get-out-the-vote effort. While there was a modest bump for GOP candidates in the last week, it was far less than for Democrats. In 2020, however, neither party saw a significant increase in the final week—meaning there was a huge change between 2018 and 2020 for Democrats, and a small one for Republicans (see Figure 7).

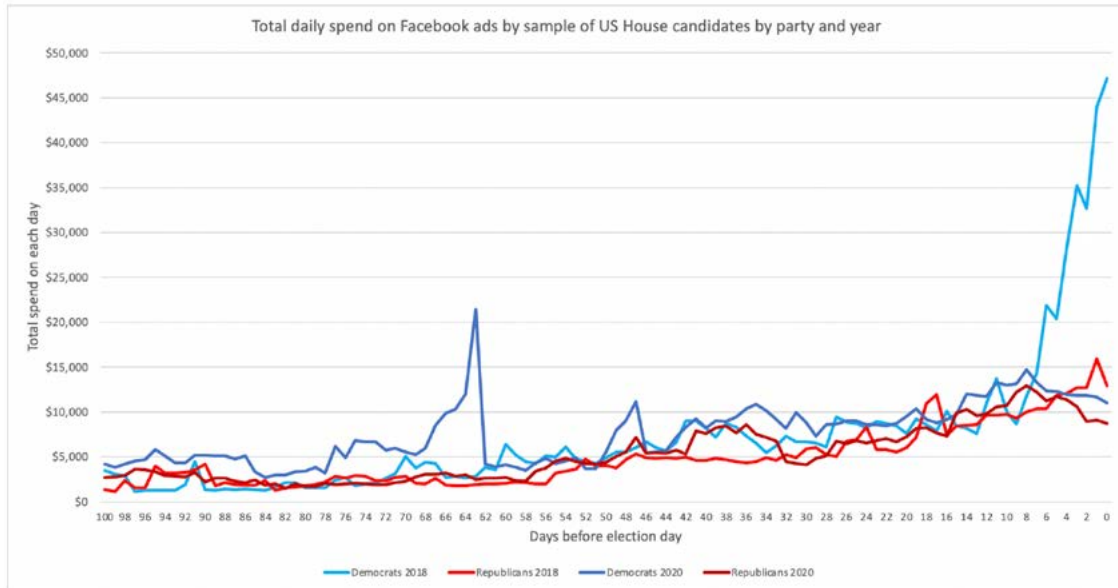


Figure 7. Daily spending totals for sample of US House congressional candidates broken down by year and party for last 100 days of each election.

Third, while we cannot confirm that there was a difference in ad content between Republicans and Democrats, interviews indicated that the shift to more evergreen content discussed above may not have been equal for both parties. While Democrats are not a reliable source for understanding Republicans (and vice versa) several Democratic strategists interviewed said they saw Republican committees successfully running ads that appeared to include specific details about voting. More importantly, in our interviews there was a difference in how strategists discussed their willingness to follow the rules set by the new policies. One Democratic strategist described the difference between Democrats and Republicans this way:

“Very frequently when Democrats are told, this is the rule book, these are the guidelines you need to work by, they are like, ‘okay, that’s what we’re gonna do.’ Whereas with Republicans—so much of their messaging, I think, has not been by the book in the past four or five years... if we haven’t had to abide by this before, why start now? (21)

This strategist suggested that Republicans were less concerned about following rules set by platforms. While no GOP operatives interviewed explicitly confirmed this, one admitted: “it’s a cat and mouse game. So we’ll keep trying to figure out how to game the system. And it’s a game to them [Facebook], right?” (4)

Summary of Findings: Who Wins & Who Loses

We have presented three main findings: the bans hurt smaller campaigns, they hindered Democrats more than Republicans, and they had minimal impact on the spread of misinformation in organic or paid content. Synthesizing these three findings allows us to hypothesize the type of campaign that would have been *least* impacted by the bans, and the type of campaign that would likely be the *most* impacted.

First, platform political ad bans would have had minimal impact on well-funded, national Republican campaigns that made heavy use of consultants and advisors who could experiment with alternative platforms, that had little organic mis/disinformation to address, and had a strong existing social media presence. For instance, the campaigns of Steve Daines of Montana or John Cornyn of Texas — both Republican incumbents running for Senate seats in Republican-leaning states — are the types of campaigns that would have been least impacted by the bans. Both were in the [top 15% of fundraisers in the 2020 US Senate election](#), both employed the prominent GOP firm FP1 Strategies, and both won by approximately 10 points. Similarly, the Trump campaign also had many of these advantages—most importantly, significant organic reach of content and nearly limitless financial resources.

On the other hand, the most impact would likely have been felt by a poorly funded state or local Democratic campaign that handled all its communication in-house and had to combat organic mis/disinformation but had a small online presence. Wally White, who unsuccessfully ran for North Carolina Senate from district 30 largely fits this profile. White, a Democrat, ran against Republican Phil Berger, who has not only held the seat since 2001, but is currently the President Pro Tempore of the NC Senate. Over the past 20 years, Berger has become a hugely influential figure in North Carolina politics. In the 2020 election, White raised [\\$19,287](#), just over 9% of Berger's [\\$2,094,345](#), leaving White at a significant disadvantage.

White placed approximately 65 Facebook ads between August and November 2020, spending, according to Facebook, \$2,268. White did not retain the services of an ad agency or consultancy; however, the NC state Democratic party connected his campaign with the non-profit [Tech for Campaigns](#). The group helped White get approved to run Facebook ads. According to White, if not for Tech for Campaigns, he would not have known about the changes to Facebook's ad policy or how to approach it. He said in an interview, "had I been on my own it could have caught me up and I wouldn't have known what's happening until I was trying to do something. But because I had the Tech for Campaigns people, they already knew in advance when the cut-off was."

Berger ran fewer Facebook ads. However, Berger has a significant organic reach on social media. Berger's [Facebook page](#) has nearly 130,000 likes and followers, and his

[Twitter account](#) has 13,400 followers. In contrast, we could not find a twitter account for Wally White, and his [Facebook page](#) has 220 followers. Berger posted regularly on his Facebook page. He also regularly linked to articles he wrote and published on "[Bergerpress](#)," his medium page. As far as we can tell, Berger avoided mentioning his opponent, however he targeted other prominent NC Democrats. See Figure 8 for an example of one article he published in the last week of the campaign.

Overall, White was a Democratic challenger with little name recognition and few resources, competing against an established incumbent who was not afraid to rely on extreme claims and who outraised him 10:1. Unable to afford an ad agency, White was lucky to be one of the campaigns aided by Tech for Campaigns, without which he likely would not have run any digital ads. While the deck was stacked against White winning the election, our findings suggested that campaigns like his would be most disadvantaged by Facebook's policy change in the last week of the campaign.

FEAR: AG Josh Stein to Withhold Public Records Until After Election



Senator Berger Press Shop Oct 28, 2020 · 2 min read



AG refuses to comply with mandatory records production surrounding secretive deal to rewrite the rules of his own election

Figure 8. Screenshot of article published on NC Senator [Phil Berger's Medium page](#).

Recommendations

Given these findings, we make the following five recommendations as platforms and governments prepare for the 2022 midterms.

First, platforms should permit political ads for the upcoming 2022 midterm elections. Paid political speech is a valuable channel for democratic debate and discussion. Digital platform ads can provide an easier-to-use and lower-cost option allowing smaller, less prominent, and/or non-incumbent candidates to compete with more established politicians. While we have little data about digital ad content, there is some indication that, [despite being more partisan, digital ads are, on the whole, less negative than TV ads](#). There is also little reason to think that organic social media content is more fair or factual, in fact, we've all seen how posting extreme and radical claims can help politicians gain large numbers of followers. At the same time, well-funded campaigns have a suite of tools available to influence and [place "organic" content](#).

This report has focused on Facebook and Google, and we recommend that both companies permit political ads to run on their platforms in the 2022 midterms. We also recommend that other platforms that stopped ads in the 2020 election cycle – such as Amazon, LinkedIn, Spotify, TikTok, and Twitter – change their policies to permit political ads in the midterms.

We also recommend that smaller platforms permit political ads. Democracy is benefited by increasing the number of venues for paid political speech. While we understand that smaller platforms are choosing to not run political ads to avoid controversy, we support efforts to encourage a wider range of platforms to run political ads. To make it easier for smaller platforms to run ads, the FEC should release additional guidance on political advertising for platforms, so that platforms have clarity on the compliance measures they need to implement to minimize the legal and reputational risk of running political ads.

As discussed above, Facebook's ban on new ads in the last week of the general was in part meant to facilitate community counter-speech. While we have doubts that the ban achieved this, we recommend that platforms take additional steps to promote counter-speech. For example, we recommend platforms give political advertisers the ability to match ad targeting of adversaries. As discussed in an [earlier op-ed](#), we believe this will allow competitors to better respond to claims within the communities where they are circulating.

Second, platforms should provide advertisers with more time and resources to navigate political advertising policy changes. For the 2022 midterms, platforms should announce election-related policies at least by May 8th, 2022, six months before

the midterms. After that date, platforms should operate with the presumption that there will be no policy changes. Although that presumption might be overridden by exigent circumstances, it will help provide advertisers with more stability and certainty in planning their communication strategies. It will also ensure that smaller campaigns have the means to navigate new platform policies.

Relatedly, we recommend that platforms produce additional resources for advertisers – in particular smaller, less-funded campaigns and committees – offering guidance and best practices for navigating political ad policy changes. Providing resources that are more detailed, more extensive and widely-available will be useful for all campaigns, but will also reduce the discrepancies between campaigns that receive more hands-on, in-person support from tech platforms and those that don't.

Third, platforms should conduct due diligence on changes to political ad policies. Platforms should conduct *political advertising impact reports* to anticipate the impact that policies may have on elections, paying special attention to how policy changes will have differential impacts across parties and campaigns. These reports can be modeled on [environmental impact statements](#) and [human rights impact assessments](#). Reports should be grounded in empirical analysis of existing data and [engagement with a wide range of stakeholders](#). Specifically, platforms should work with a range of digital ad professionals at campaigns, agencies, and other political organizations to understand the likely impacts of new policies. Ideally these reports would be completed by external organizations so that they provide a more independent assessment of potential impacts of those policies. The length, format, and substance of these reports should be flexible so that even smaller platforms with fewer employees and more limited financial resources can conduct them.

Platforms should also release impact reports, completed 6-12 months after a policy takes effect, that evaluate the costs and benefits of the policy intervention, recommend whether the intervention be continued, and include options for mitigating costs. Platforms could work with neutral third parties, such as academics and non-profit technology experts, to conduct these reports.

Similarly, we recommend that platforms include information about content enforcement and action against political ads in their transparency reports. For example, Facebook, which publishes [quarterly transparency reports](#), has so far not provided information about action against political ads, such as about the enforcement of their prohibition on ads that provide misleading information about voting places, processes, and requirements. Google also provides little specific information about removals or takedowns of political ads in its [transparency reports](#).

Fourth, platforms should apply to paid content *at least* the same standards and enforcement practices as to organic content. For example, if platforms choose to label organic content deemed false by third-party fact checkers, they should *also* label paid content deemed false by third-party fact checkers. Paying for content should not exempt an advertiser from content restrictions or moderation.

Finally, Congress should prohibit misinformation intended to suppress voting. While we support the steps that platforms have taken to prohibit this content, we believe governments should set the rules on political advertising. Instead of giving platforms the power and responsibility to play the lead role in regulating political advertising, Congress and the Federal Election Commission should take control.

Senator Ron Wyden, one of the original crafters of Section 230, has [expressed](#) support for criminalizing some forms of election misinformation, recognizing that it will increase platform liability while preserving core Section 230 liability protections. Policymakers should consider criminalizing online deceptive practices in voting, such as spreading false or misleading information about election processes, locations, or ID requirements. Passing a bill such as the [Deceptive Practices and Voter Intimidation Act](#) — originally introduced by then Senator Barack Obama in 2007 and recently included in the [For the People Act of 2021](#) — would achieve this objective.

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The Center on Science & Technology Policy

[The Center on Science & Technology Policy](#) is a collaboration between the Duke Sanford School of Public Policy and the Duke Initiative for Science and Society. CSTP serves as an interdisciplinary hub for science and technology policy analysis by bringing together policymakers, academics, non-profits, and industry to explore challenges and generate actionable policy solutions. CSTP brings together policymakers, academics, non-profits, and industry to explore these policy challenges and translate them into innovative policy solutions.

Methodological Appendix

Semi-Structured Interviews

We completed semi-structured interviews with 22 professionals who had experience with digital political ads in the 2020 election. These included a mix of digital strategists, campaign staff, consultants, and political candidates. Interview subjects were identified in a number of ways. First, using Federal Election Commission (FEC) records, we identified the consultancies that received the most money in the 2020 election cycle. Using LinkedIn and information available on public websites, we then contacted employees at both left and right-leaning firms. We also identified and contacted campaign staff at a variety of national and North Carolina state campaigns, as well as experts at civil society organizations. Several informants were found through snowball sampling. Interviews lasted from 15 to 65 minutes. All informants were granted anonymity to ensure that all felt comfortable sharing detailed and frequently sensitive information about campaign strategy and relations with major platforms. We have identified each with a number (Table 1).

Interviewee ID	Party Affiliation	Profession
1	DEM	Candidate
2	N/A	Civil Society
3	DEM	Consultant
4	GOP	Party/Campaign Staff
5	DEM	Consultant
6	DEM	Party/Campaign Staff
7	DEM	Party/Campaign Staff
8	DEM	Consultant
9	DEM	Party/Campaign Staff
10	GOP	Party/Campaign Staff
11	N/A	Civil Society
12	GOP	Consultant
13	DEM	Consultant
14	DEM	Candidate
15	DEM	Consultant
16	GOP	Consultant
17	GOP	Party/Campaign Staff
18	DEM	Candidate
19	GOP	Consultant
20	DEM	Consultant
21	DEM	Consultant
22	N/A	Civil Society

Table 1. Interview subjects

As seen in Table 1, we interviewed six Republicans and thirteen Democrats. While we contacted roughly the same numbers of potential informants, fewer Republican-affiliated professionals were willing to be interviewed. The three informants we have listed as “civil society,” work for non-partisan non-profits or news outlets.

The three political candidates interviewed were North Carolina state-level politicians. Those listed as Party/Campaign Staff, worked either for national party organizations or political campaigns. Those campaigns included state-level and national House and Senate races. Those listed as “Consultants” worked for a variety of left and right-leaning agencies. Given how we identified potential informants (contacting consultants at agencies that received large amounts of money in 2020 election according to FEC data) most consultants worked at prominent national agencies and had a range of state and national clients.

All interviews were held on the phone or over zoom. Interviews were recorded and transcribed. Transcripts were analyzed for key topics and themes and iteratively coded by hand in NVivo. To do the coding we analyzed 5 initial interviews to identify common codes, and then recoded all interviews according to those themes, adding additional codes as necessary.

FEC Data

We also gathered and analyzed data from the Federal Election Commission (FEC). Federal law requires that all political committees regularly report both contributions and spending to the FEC. These data are cleaned and uploaded into a publicly accessible database. Our data came from a series of targeted searches of the FEC spending database. First, we searched for all advertising-related entries from the last month of the campaign (10/3/2020-11/3/2020). To do this we searched both disbursements and independent expenditure records that contained a series of advertising related keywords that were iteratively generated, looking at keywords in descriptions for known entries. Our final list of keywords included: ads, advertising, advertisement, media, commercial, marketing, newspaper, radio, TV, television, billboard, social media, internet, mailer, stickers, billboard, signs, buttons, stickers, web, Facebook, Google, Snap, Reddit, Parler, Hulu, Gab. We then cleaned these data, removing entries that were obviously not related to advertising. For the Georgia runoff election, we used a similar approach to gather all entries between 11/4/2020-1/5/2021. Because we were interested in advertising placement, we removed entries that specifically indicated they were for advertising production. We recognized that because spending descriptions were often vague, and many entries simply said “ads” or “media,” we may have included some entries for media production. Additionally, many consultancies were “full-service” firms that did production and placement. Data were hand coded, identifying payments to ad agencies, and those directly to advertising platforms, as well as collapsing the unstandardized descriptions into standardized categories. For example, we collapsed “Internet Ads,” “Web ads,” “social media advertising,” all into the same category of “digital ads.”

Platform Political Ad Archives

After gaining access to **Facebook’s ad library** API, we randomly sampled 10% of US house districts. We then identified the main candidates from each party for the general election, both winners and losers. We then scraped all data in the API for those candidates. Importantly, we only analyzed data from each candidate’s official committees, rather than from all committees that placed ads referring to them. We identified candidates and then collected data from 2018 for the same districts. 2016 data is not included in Facebook ad library. Because the library lists a spending range over a range of dates, we took the average total spending amount for an ad and distributed

it over the date range.

In their transparency reports, **Google and Snap** both provided a single large CSV file with all political ad data for 2020 election. We parsed these for just US data for the last month of the 2020 campaign and for the Georgia runoff. As with Facebook, we distributed average spending over date ranges.

ClaimReview is a formatting standard and tagging system for Fact Checks. Claim-Review currently includes dozens of fact checkers around the world, including many signers of the [International Fact-Checking Network Code of Principles](#). Google currently maintains a database of all fact checks that follow ClaimReview system. Working with the Duke Reporters' Lab, we searched this archive both for all English-language fact checks from the last month of the election, and all that contained the key words "ads" or "advertisement."