

After the Settlement: Ensuring Meta's Protections Work

Nine recommendations for effective oversight of the multistate agreement to protect young users on Facebook and Instagram

The landmark multistate [Meta settlement](#) creates significant new binding requirements intended to protect young people using Facebook and Instagram. Whether the settlement actually reduces the risks and harms it is intended to address will depend on execution and oversight.

One requirement of the settlement is that an independent third-party auditor (Independent Auditor) evaluate Meta's implementation of the mandated platform changes, a provision that is crucial for credible oversight and accountability. In the coming months, attorneys general and Meta will select the Independent Auditor and establish a workplan for evaluating implementation of the settlement. These decisions will shape what the Independent Auditor will measure, what information it can access, and ultimately whether the settlement's impact on users is meaningfully assessed.

Past experience underscores the importance of getting this right. Evidence from litigation and independent assessment shows that deploying a safety feature does not necessarily mean young people actually use it or benefit from its intended protections. Effective oversight must, therefore, go beyond simply verifying whether Meta appears to have implemented the settlement's requirements and actually assess whether those changes result in measurable improvements.

Drawing on lessons from independent research and past legal remedies, this brief sets out nine recommendations for an effective independent audit, one that ensures the settlement delivers measurable protections for young people.

Settlement Overview

On August 26, 2026, 47 states, the District of Columbia, and three US territories agreed to a landmark [settlement agreement](#) with Meta. [Texas](#) announced a separate agreement on the same day. Attorneys general sued Meta, [claiming](#) that the company designed its products to maximize young users' time on its platforms while misleading the public about the safety of its products. The settlement agreement includes \$12 billion to \$18 billion in monetary payments to states as well as specific design changes intended to protect young people on Meta's platforms.

Required design changes for under-18 users include daily usage limits, restricted access between midnight and 6 a.m., limits to push notifications, hidden like and reaction counts, a ban on beauty filters, and the option of a non-personalized, chronological feed. Meta also agreed to strengthen age assurance, remove under-13 users, and improve its teen safety and parental control tools. Several of the limits in the settlement will tighten further if other platforms adopt similar rules.

Importantly, the settlement creates an Independent Auditor that is responsible for monitoring Meta's implementation of the agreement. That oversight is particularly important given that evidence from the [litigation record](#) and [independent assessment](#) shows that Meta has repeatedly announced and deployed safety features that failed to address risks.

Nine Recommendations for Accountability Through Independent Oversight

1. Focus on outcomes

The settlement's effectiveness must be measured based on changes in outcomes for young users, not merely whether Meta implements product changes.

It is simple to verify whether Meta has announced a policy or deployed a specific feature. But a check-the-box compliance audit is not enough. The independent audit must verify whether Meta's policies and product design changes [are used](#) by young users and [measurably reduce](#) the risks central to the settlement: compulsive and problematic use, underage use, unwanted contact and sexual exploitation, social comparison, recommendation of illegal goods, and self-harm.

The Auditor should therefore include a focus on outcomes. Changes in proxy metrics, such as screen time, can help identify the mechanisms through which an intervention affects user behavior, and these are important for the Auditor to assess. However, proxy metrics do not offer conclusive evidence that the underlying risk has been reduced. Effectiveness should ideally be assessed through a combination of proxy metrics and measures that more directly capture outcomes related to the risks the settlement is intended to address. To measure these outcomes, the Independent Auditor should rely on both Meta's internal data and independent data collection. This could include analysis of raw and aggregate data, review of internal documentation, interviews with Meta staff, [surveys of users and parents](#), or [tests with simulated accounts](#). It is critical that conclusions about settlement effectiveness do not rely solely on data that Meta defines and controls. As detailed in Recommendation 4, the Auditor should have the ability to set specific methodologies and metrics.

2. Select an Independent Auditor with relevant expertise

The Independent Auditor must have relevant, demonstrated experience conducting effective platform investigations and audits.

Auditing is difficult to do well. The experience of independent [assessment](#) of Federal Trade Commission remedies, [monitoring](#) of technology litigation remedies, and independent [audits](#) under the Digital Services Act shows that effective digital platform audits [require](#) specialized skills. Organizations like the [Cybersafety Research Center](#), the [Institute for Strategic Dialogue](#), and the [Integrity Institute](#) have demonstrated experience investigating and auditing social media companies and should be considered as candidates to become the Independent Auditor. If a specialized research organization is not selected as the Independent Auditor, the selected Auditor should employ staff with relevant expertise as well as contract with specialized organizations and individuals who have deeper experience researching and auditing social media platforms.

The auditing team should have [varied expertise](#). For example, an effective settlement auditing team should include professionals with experience in engineering, experimental design and statistics, data science, trust and safety, human-computer interaction, and conducting audits of social media or adjacent domains (e.g., AI and cybersecurity). Regardless of their specific area of expertise, individuals involved in the audit should have experience applying their expertise to digital platforms.

3. Guarantee Auditor independence

The Auditor must maintain genuine independence from Meta throughout the assessment period.

Under the settlement, Meta and the Attorneys General State Committee have shared responsibility for selecting the Independent Auditor, while Meta has responsibility for contracting with the organization. The contractual relationship between the Independent Auditor and Meta must guarantee independence by insulating the Auditor's compensation, data access, and findings from Meta's control. The Independent Auditor should have no ongoing financial relationships with Meta, its employees, or its contractors beyond the audit engagement itself. To the extent practicable, members of the audit team should also be free from close personal or professional relationships with Meta employees that could create an actual or perceived conflict of interest. Where such relationships do exist, the Auditor should disclose their nature and extent, including relevant past and present connections, in the audit documentation.

4. Empower the Independent Auditor to require specific methodologies and metrics

To ensure meaningful accountability, the Independent Auditor should have the authority to require measurement of identified outcomes with specific methodologies and metrics.

Under the settlement agreement, the Independent Auditor has responsibility for assessing Meta's implementation and evaluation of the settlement's Injunctive Relief Terms. The Independent Auditor must therefore have the ability to establish specific [measurement strategies](#) to assess the settlement. For example, the settlement requires measures to reduce exposure to unwanted contact between minors and adults. The Independent Auditor should be empowered to evaluate effectiveness using both platform log data and user surveys.

More generally, the Independent Auditor must be provided with sufficient access to underlying infrastructure and data — including raw logs, preprocessed data, and derived or otherwise transformed data — to assess both Meta's evaluation methodologies and results. Where the audit requires assistance from Meta employees — for example, to facilitate database access or explain relevant data sources, tools, or infrastructure — Meta should be required to provide that support and ensure that employees face no adverse professional consequences for doing so.

5. Assess the full scope of settlement outcomes

The Independent Auditor should monitor all provisions of the settlement agreement.

The settlement agreement is inconsistent in how it references requirements for audit of Injunctive Relief Terms. Several design change requirements reference auditing, including [age assurance](#) and circumvention resistance, productive pauses, identification of secondary accounts, and exposure to harmful experiences and people. Other design changes, including night and school mode, daily limits, recommender system requirements, and user reporting, do not specifically describe mechanisms for auditing. The Independent Auditor should be responsible for assessing outcomes related to all provisions of the settlement, not only those that explicitly reference audit requirements.

6. Ensure public scrutiny

Audits must provide users and the public with the information necessary to determine whether the settlement terms are addressing risk.

The settlement requires that the Independent Auditor release public executive summaries for each report. Claims made by state attorneys general against Meta center on how the company [misled](#) users and the public about the effectiveness of its safety features. Documents [released](#) through discovery show that Meta had the data and capabilities to assess whether safety features actually address risk, but failed to disclose safety tool effectiveness to the public.

The public executive summary is a key vehicle for demonstrating settlement effectiveness and building trust in outcomes. The summary must include specific data related to the measurement of defined outcomes. Overly generalized, high-level summaries of settlement implementation will offer the public little relevant information and do little to strengthen trust over time. As part of its public communications, the Independent Auditor should consider strategies to solicit input and feedback from users and the public on a regular basis.

7. Prepare for disputes

State attorneys general should proactively plan for Meta's non-compliance.

While the settlement is rooted in [cooperation](#), attorneys general's claims against Meta center on the company's deception and false statements. State attorneys general must not assume that Meta will comply with the settlement in ways that address risks. State attorneys general should insist on a comprehensive auditing workplan and proactively prepare to trigger the dispute resolution provisions in Section VIII of the settlement to enforce settlement terms. This requires that state attorneys general have sufficient resources for ongoing supervision. State-level settlement funds could be used to sustain supervision, research, and enforcement. The public should know when and why dispute resolution is triggered, as well as the outcomes of the resolution process.

8. Implement Meta's independent social media research foundation

Meta's [announcement](#) of a new independent social media research foundation as part of the settlement should complement Independent Auditor oversight.

In announcing the settlement, Meta [stated](#) that the company will “establish an independent social media research foundation.” The foundation will allow researchers access to specific user data with the goal of advancing “independent research into teen well-being and grow[ing] our collective understanding of how to best support teens online.” While the social media research foundation is not referenced in the settlement itself, this is an important development. Meta should honor its commitment and provide independent researchers with reliable and effective [access](#) to platform data necessary to conduct research into teen well-being. Independent research can be an important source of information for the Independent Auditor and complement the Auditor's own assessment.

9. Fund independent user research

State settlement funds should support independent user research, including ongoing population-level survey measurement of prevalence and severity of specific harms.

Settlement funds [should be used](#) to support independent organizations conducting user research, including [ongoing population-level surveys](#) that measure the prevalence and severity of harms. Understanding the nature and prevalence of harm on Meta's platforms, as well as other platforms, is important for understanding the effectiveness of remedy implementation. Platform, academic, and civil society researchers have developed increasingly robust measurements of specific harms. Funds from the settlement agreement should catalyze and sustain user research conducted by entities independent of Meta, its Auditor, and other platforms. Such independent research can help verify settlement outcomes for users, enable cross-platform comparisons, and [strengthen](#) scientific knowledge about the relationships between social media use, intermediate outcomes, and subjective well-being.

Conclusion

The Meta settlement creates an important opportunity to test whether specific changes to platform design and safety practices can improve outcomes for young people. However, realizing that potential will require more than verifying that Meta has appeared to implement the settlement's individual design and policy requirements. Effective oversight must assess whether those changes work in practice and whether they measurably reduce the harms the settlement is intended to address.

The decisions made in the coming months will shape that oversight for years to come. Selecting an Independent Auditor with the right expertise and independence, ensuring its access to the data required for rigorous evaluation, measuring the full range of settlement outcomes, and providing meaningful transparency to the public will all be critical. Independent research can further strengthen the evidence available to evaluate whether young people are safer on Meta products. Ultimately, the settlement's success should be measured by whether its requirements measurably reduce risks to young people.