



Washington State

And Digital Media Buying
For Political Campaigns

How to
Navigate the
Changing Rules

By Alex Gabriel, Art Colts and Royle Johnson - July 7, 2018

Increasing Transparency of Political Digital Advertising Ahead of the 2018 Midterms

The U.S. Intelligence community accused foreign operatives tied to the Russian government of meddling in the 2016 election via ads on Facebook and other digital properties. Nearly two years later, Facebook and other major tech firms had done little to remedy the issue of dark money filtering into online political advertising, even after a **Capitol Hill grilling of Mark Zuckerberg** and **a collapse in public confidence** in Facebook.

That is all changing after the State of Washington passed a law this month that requires full public disclosure on all political ads that appear online. Both Google and Facebook immediately halted their political ad programs in Washington after the **state's attorney general filed lawsuits** against the companies stating they “failed to obtain and maintain”

political ad transparency required by law. And now, both Facebook and Google are updating their public disclosure policies nationwide. Facebook has already rolled out an ad policy requiring a more rigorous verification process for anyone paying to promote political content. Google will begin enforcing Disclosure requirements for political advertising in the United States on July 10, 2018. All other major tech firms, including Twitter, will follow suit this summer.

Facebook, Google, Twitter and **the online publishing industry** are not going to leave 2018 mid-term political money on the table. Expect all transparency issues to be resolved by the beginning of August at the latest.

What Qualifies as a Political Ad?

Facebook, Google, and Twitter all identify political ads as made by, on behalf of, or about:

- ✓ **Candidates or committees registered with the Federal Election Commission (FEC)**
- ✓ **Political issue advocacy**
- ✓ **Politicians**
- ✓ **Elections**
- ✓ **Political parties**
- ✓ **Referendums**
- ✓ **Political organizations**
- ✓ **Ballot measures**

Any advertising asserting a position on major national issues on abortion, guns, immigration, etc. will also come under scrutiny. Even ads that do not take a side, but simply encourage action like “get out the vote” will need to be verified.

However, Twitter’s policy will not apply to issue advertising or to individuals currently in office.

To ensure full compliance with **Facebook** and **Google’s** public disclosure requirements, all political advertisers must earn authorization by confirming they are or represent an individual politician or organization. The authorization process for **Google, Facebook, and Twitter** requires the following to be submitted:

Individuals or organizations registered with the FEC must provide:

- ✓ **A valid Federal Election Commission ID**

Individuals or organizations not registered with the FEC must provide:

- ✓ **Driver’s license or US passport**
- ✓ **US-based residential mailing address**
- ✓ **Last 4 digits of Social Security number**

What Will Political Ads Look Like on Each Platform?

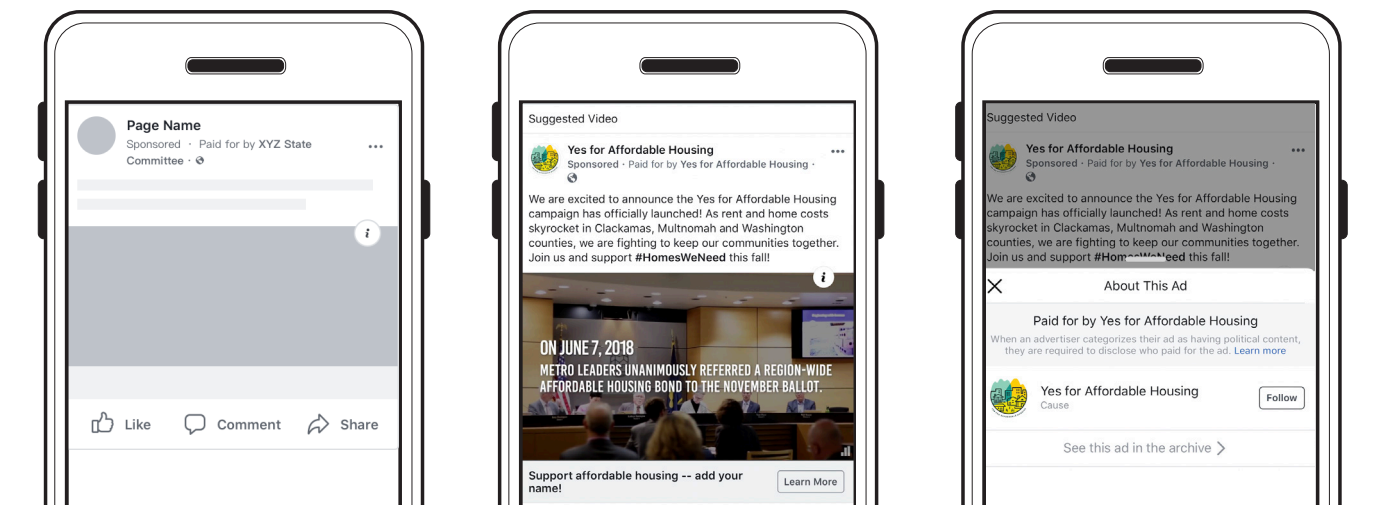
Once authorized, the disclosure message will be automatically added to all ads on Facebook, Twitter, and AdWords. No manual action

is necessary to be in compliance. The disclosure message will match the information provided in the authorization request.

facebook

A disclaimer that specifies the ad was **“Paid for by [your disclaimer]”** will be at the top of each Facebook ad that includes political content.

The same disclaimer will appear on Instagram ads as well. Note that to run ads on Instagram, the Facebook Page name and Instagram profile name must match exactly.





Google will **automatically generate a “Paid for by” disclosure** for most ad formats, using the information provided during this verification process.

- ✓ The disclosure will show in ads directly on Google Search and the Search Partner network

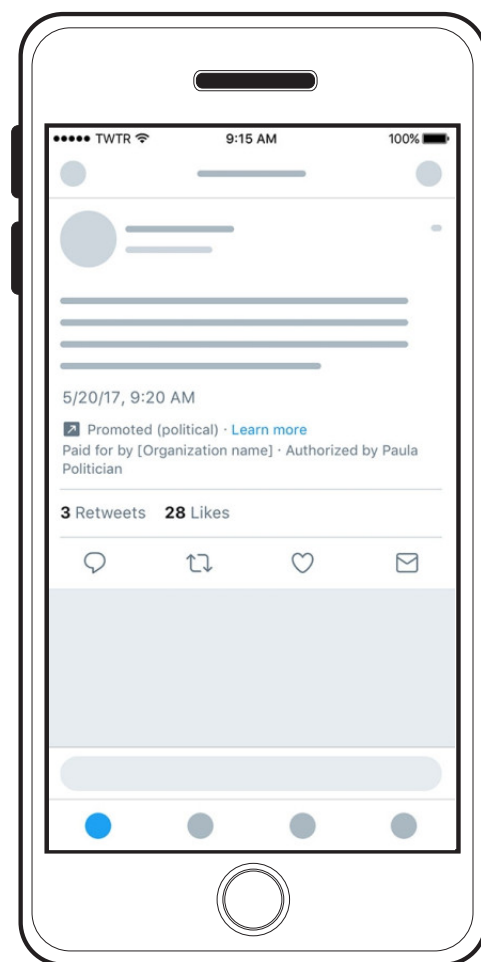
- ✓ The disclosure will show in “Why this ad?” on YouTube, accessed through the info icon or the 3-dot icon

- ✓ The disclosure will show in “Why this ad?” on websites and apps that partner with Google for display ads, accessed through the AdChoices icon



Similar to Facebook, **a disclaimer that specifies the ad was “Paid for by [Organization name]”** appears below each Twitter ad that includes political content.

Additionally, profile photos, header photos, and the linked website in the handle profile must be consistent with the handle’s online presence.



What Should Candidates and Campaign Managers in Washington Do?

#1 Monitor Rule Changes

Candidates and campaign managers need to carefully monitor the digital advertising “rules” as they change again over the summer. As

soon as rule changes happen, they will be posted at [RoyleMedia.com/blog](https://www.roylemedia.com/blog). Sign up to get alerts about the latest blog posts.

#2 Prepare Campaigns for Immediate Deployment

Get a jump on the competition and start running ads as soon as possible. Have the creative finished, budgets set and all the credentials ready for authorization. It will

take most campaigns weeks to react. Promote yourself while the other political campaigns are playing catch up. You will have the political spotlight to yourself.

#3 Shift Digital Media Tactics Until Rules are Changed

While Google, Facebook, and other major programmatic networks have indefinitely halted serving political ads in the state of Washington, there are still other options and workarounds.

You can still purchase political ad inventory directly from local news websites, given that these ads (both display and video) properly follow the state disclosure law. Royle Media has also identified video advertising networks (outside of YouTube) that can be geo-targeted too.

Run audio spots on streaming music services like Pandora, Spotify or TargetSpot.

A :30-second spot promoting a candidate or ballot measure can target Washington listeners, as long as the spot is accompanied by a disclosure. Both audio platforms can target by geography, gender and age.

These advertising options should provide strong digital coverage until Google, Facebook, and other programmatic networks update their policies to comply with the new state law. Expect to have the issue resolved in time to amplify your advertising strategy ahead of this year’s midterm elections. Google and Facebook will not leave that money on the table.

Case Study Authors

Alex Gabriel

Alex Gabriel is the primary author of this study. He is the Digital Advertising Director at Royle

Media and manages strategy and media buys for 24+ local and national accounts.

Art Colts

Art Colts is Kittitas County Committeeman to the Washington State Republican Central Committee.

Through I-20/20 Media Group he is also active in designing and managing e-media

publishing and marketing campaigns for both political and private sector communications. These campaigns typically focus on local and community engagement providing local contact to local content.

Royle Johnson

Royle Johnson is a Seattle native and has been building websites and promoting them for 20+ years. He is the primary digital strategist, creative director and business developer at Royle Media. His strong back-

ground in traditional media, printing and direct mail is helpful for political campaigns. Call or email Royle with questions **(503) 577-6905, royle@roylemedia.com.**