

Case 8: Is it a recommendation or an ad?

Content note

This case explains general rules. It is not legal advice for your situation.

Overview

Students read a short story in which a publisher sends Gia a free novel to review. Her video tags the publisher but never says the copy was free. They compare the publisher’s email, the video script and Caio’s edit notes with the FTC’s disclosure guidance for social media. They then rewrite the video’s opening and caption so that a viewer watching with the sound off learns about the free copy.

Before this case

Students should already be able to:

- summarize an official guidance document accurately
- tell a rule from an example of the rule
- write an organized text of about 400 words

Objectives

Students will be able to:

- write a disclosure policy that covers audience, channel and consistency
- explain the difference between FTC guidance and the statute it interprets
- include a step that checks whether a disclosure worked

Objectives, continued

- keep the policy practical for a small creator team

Materials

- This chapter, one copy per student
- Evidence A, B, C and D
- The FTC’s Disclosures 101 page and its Endorsement Guides questions and answers

The task in this edition

Task: Build a creator communications policy for the crew: when to disclose, how, and how to check it worked.

Students make: Policy, 400—500 words

Pacing

Opener (page 146): 4 min. Short on time: 3 min. Students read What happened on their own.

Key terms (pages 147 and 148): 4 min. Short on time: skip.

Look at the evidence (page 152): 8 min. Short on time: 7 min. Students fill in only the What it shows boxes.

Look at the evidence (page 153): 6 min. Short on time: 4 min. Read Evidence D aloud; skip its boxes.

Key idea (pages 154 and 155): 10 min. Short on time: 8 min. Read both FTC rows. Skip In the news.

Pacing, continued

Sort the evidence (page 156): 7 min. Short on time: skip.

Practice (page 157): 6 min. Short on time: skip.

Your task (pages 158 and 159): 12 min. Short on time: 10 min. Fill in the guidance-and-statute box together.

Your draft (page 160): 28 min. Short on time: 24 min. Students draft the core sections in class and finish the full policy at home.

Check your work (pages 161 and 162): 8 min. Short on time: 4 min. Students answer the four questions only; skip the rubric.

Questions to discuss (pages 163 and 164): 10 min. Short on time: skip.

Talk about this case at home (page 165): at home.

Periods: full chapter 103 minutes; one period 60 minutes.

Standards

RI.11-12.1 Back up an analysis with the strongest evidence from the text, including where the text leaves things uncertain.

W.11-12.2 Write an explanatory text that conveys complex ideas clearly and accurately.

W.11-12.5 Strengthen writing by planning, revising, editing or rewriting, focusing on what matters most for the purpose and audience.

Case 8 plan, continued

Standards, continued

SL.11-12.1.c Keep a discussion moving with questions that probe reasoning and evidence, and make sure the full range of views is heard.

SL.11-12.1.d Respond to different views, pull together what each side says, resolve conflicts where possible and name what still needs research.

D2.Civ.6.9-12 Critique the relationships among governments, civil society and markets. In this case: Students critique relationships among creators, platforms, brands and regulators.

D3.2.9-12 Judge a source's credibility by looking at how experts value it. In this case: Students evaluate the credibility of a recommendation given its source relationship.

Codes of ethics

- **FTC Endorsement Guides (16 CFR Part 255):** § 255.5 Disclosure of material connections
- **FTC Endorsement Guides (16 CFR Part 255):** § 255.0 Purpose and definitions, paragraph (f)
- **PRSA Code of Ethics:** Free Flow of Information

Heat map

- **Opener (page 146):** Low
- **Key terms (pages 147 and 148):** Low

Heat map, continued

- **Look at the evidence (page 152):** Low
- **Look at the evidence (page 153):** Low
- **Key idea (pages 154 and 155):** Low
- **Sort the evidence (page 156):** Low
- **Practice (page 157):** Low
- **Your task (pages 158 and 159):** Low
- **Your draft (page 160):** Low
- **Check your work (pages 161 and 162):** Low

Try it at your school

Check the relationship before you trust the review.

- Next time you see a recommendation, look for a disclosure in the video itself
- If you post reviews, practice a clear spoken line like “They sent me this for free”
- Share a disclosure checklist with a school media club
- Don’t accuse real creators; practice on your own sample posts

Who to ask: School media or journalism advisor, a librarian, a digital citizenship teacher

Safety: Don’t share personal information to get free products. Talk with a trusted adult before accepting any brand deal.

Sources

- TikTok Newsroom, “BookTok and publishing,” September 2022
- Federal Trade Commission, “Disclosures 101 for Social Media Influencers,” No date listed
- Federal Trade Commission, “FTC’s Endorsement Guides: What People Are Asking,” No date listed
- Federal Trade Commission, “FTC explanatory video,” No date listed

Case 8: Is it a recommendation or an ad?

Gia loves a novel that a publisher sent her for free, and her video review does not mention the free copy yet.

On your own Read What happened. Underline what the publisher sent Gia and what it asked for. About 4 minutes.



Gia, Caio and Mari set up a camera in a bright studio.

Your role: You're the viewer with the sound off who checks the first three seconds. **New skill:** Spot and disclose a material connection.

What happened

At 1:30 p.m. on Saturday, Caio finishes editing Gia's short video review of a new novel. Gia made the review for BookTok, where people recommend books on TikTok. She stayed up until 2 a.m. to finish the novel, and she loves it.

Two weeks ago, the book's publisher emailed Gia. The publicity team offered her a free copy of its spring novel for review. The email said she did not have to post, but it asked for a tag if she did. In the first cut, Gia never says the book was free. The only sign of the publisher is a tag in the caption below the video.

Caio wants to watch the cut the way a stranger would, on a phone with the sound off. He wants to know whether the first three seconds say the book was free. Gia wants to keep her honest opinion in the video. She also wants viewers to know how she got the book.

Your question: Do Gia's viewers need to know the book was free, and how should she tell them?

Pacing

Full chapter: 4 min.

Short on time: 3 min. Students read What happened on their own.

Say this

"Gia stayed up until 2 a.m. finishing this book. Does it matter how she got it?" — Take three answers. Do not settle it yet.

Watch for

Misconception: Students decide a free copy makes the review a lie. **Listen for:** "She only likes it because it was free." **Then:** Ask what the evidence says about her opinion. Nothing shows it is false; the free copy is context.

Support

- Read What happened aloud while students follow along.
- Explain BookTok in one sentence: people on TikTok recommending books.

Heat check

Low.

Key terms

On your own Read each key term and its example. Then write your first guess in the box. About 4 minutes.

Material connection A material connection is a relationship with a brand, like payment or a free product, that viewers might not expect.

En español: conexión material

In this case: The publisher sent Gia a free copy of its spring novel for review. That free copy is a material connection.

Disclosure A disclosure is a clear statement that tells people about a relationship or fact they would want to know.

En español: divulgación

In this case: Gia's first cut has no disclosure. The tag in the caption names the publisher but never says the book was free.

Endorsement An endorsement is a message that shares someone's opinion or experience of a product to promote it.

En español: respaldo

In this case: Gia's video review promotes the novel with her own opinion: she stayed up until 2 a.m. to finish it.

Who is involved



Gia

Made the video review

"I stayed up till 2 a.m. finishing it. That part's real. The publisher sending it free is also real, and right now it's nowhere in the video."

Caio

Editing Gia's video

"The publisher's email literally says 'free copy for review.' That's the sentence. It's just not in the video yet."

⌚ Pacing

Full chapter: 4 min.

✂ Short on time: skip this page.

💬 Say this

"Which key term names the free copy? Which one names what Gia still has to add?" — Wait for material connection, then disclosure.

👁 Watch for

Misconception: Students hear "material" as physical stuff, like paper. **Listen for:** "The material is the book." **Then:** Reread the definition: a material connection is a relationship with a brand, such as a free product.

📖 Support

- Pair students who share a language to explain each term in their own words.
- **Cognates:** connection (conexión), material (material), recommendation (recomendación), relationship (relación), product (producto), opinion (opinión), audience (audiencia), video (video).

🔥 Heat check

■□□ Low.

🔑 Answer key

Any first guess is fine. Students return to it on the My take page.

Before you look at the evidence, does Gia need to tell viewers the book was free?

➤ My first guess is that she should mention it, but the tag in the caption probably covers it.

This image shows a single sheet of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

This page continues page 147. The notes for both pages are on the sheet for page 147.

Reading passage

Honest opinion, hidden relationship

On your own Read the passage. At each Stop and think box, pause and answer the question in your head or with a partner. About 5 minutes.

Words to know

- **Material connection:** A material connection is a relationship with a brand, like payment or a free product, that viewers might not expect.
- **Disclosure:** A disclosure is a clear statement that tells people about a relationship or fact they would want to know.
- **Endorsement:** An endorsement is a message that shares someone's opinion or experience of a product to promote it.
- **Framing:** Framing is choosing which parts of a situation a message brings forward.

The story: The edit that is almost done

Gia's review is sincere. She stayed up until 2 a.m. finishing the novel, and her video for BookTok, TikTok's book-recommending community, captures that. Caio, who edits video and has a habit of checking before posting anything that involves someone else, finishes the cut at 1:30 p.m. on Saturday. Gia is ready to publish.

Caio asks for one more pass, done the way most viewers would watch: once, on a phone, with the sound off. He is looking at the first three seconds. The question he wants answered is whether a stranger could tell that the book was free.

It was. Two weeks earlier, the publisher's publicity team emailed Gia to offer a free copy of its spring novel for review. The email said there was no obligation to post but asked for a tag if she did. The first cut opens with Gia saying she literally could not put the book down. There is no on-screen text, and the only trace of the publisher is "@publisher #booktok" in the caption below the video.

Gia's first defense is the tag. Caio's edit notes reply in four words: tag equals brand name, not relationship. Your role in this case is to be the viewer with the sound off who checks the first three seconds.

? Stop and think. Why does the case insist that the free copy does not make Gia's opinion false?

Pacing

Reading: about 5 min (743 words). Short on time: read it aloud together, pausing at each Stop and think.

? Stop and think

1. **After “The story: The edit that is almost done”:** Why does the case insist that the free copy does not make Gia's opinion false?
2. **After “Separating the opinion from the relationship”:** Apply the FTC's “clear and conspicuous” definition to the caption tag. Does the tag meet it?
3. **After “Rules, enforcement and evidence”:** Who should make sure disclosures are clear: creators, brands or platforms?

Separating the opinion from the relationship

Three terms keep the analysis clean. An **endorsement** is a message that shares someone's opinion or experience of a product to promote it. A **material connection** is a relationship with a brand, like payment or a free product, that viewers might not expect. A **disclosure** is a clear statement that tells people about a relationship or fact they would want to know. Gia's review is an honest endorsement with an undisclosed material connection. The connection does not make her opinion false. It changes what a viewer needs to know to weigh it.

This is a framing problem, in the Case 1 sense of **framing**: choosing which parts of a situation a message brings forward. The first cut brings forward enthusiasm and leaves the relationship in a caption that many viewers never open. Caio's fix reorders the frame without deleting anything true. The video opens with a three-second line, "Quick heads-up, the publisher sent me this free," spoken and on screen, followed by Gia's hook.

The case also asks what a disclosure does not do. Gia had considered calling the novel the best book of the year and then asks herself, out of the ones she happened to read? She replaces the superlative with what she can support: two nights, could not put it down. A disclosure answers how she got the book. It does not make every claim in a review accurate.

Finally, the case tests the fix on an audience. Caio will show the cut to someone who did not help make it and ask whether the book was free. If they hesitate, the disclosure is not clear yet. A comment on another creator's review shows the cost of late discovery: "wait was this sponsored?? kind of feels like an ad now." The comment is about someone else, and nobody knows whether that review was sponsored, which is the point.

? **Stop and think.** Apply the FTC's "clear and conspicuous" definition to the caption tag. Does the tag meet it?

Rules, enforcement and evidence

The Federal Trade Commission's Endorsement Guides explain how federal law against deceptive practices applies to endorsements. The current text says material connections "can include monetary payment or the provision of free or discounted products ... to an endorser, regardless of whether the advertiser requires an endorsement in return" (16 CFR Part 255, as revised 2023). The same guides define "clear and conspicuous" as "difficult to miss (i.e., easily noticeable) and easily understandable by ordinary consumers." FTC staff guidance for video says the disclosure belongs in the video itself, ideally both spoken and on screen (Federal Trade Commission, updated December 3, 2024).

Enforcement has followed. In November 2023, the FTC warned two trade associations and a dozen influencers about posts promoting aspartame or sugar, stressing that disclosures belong in the video, not a caption (Federal Trade Commission, November 14, 2023).

This page continues page 149. The notes for both pages are on the sheet for page 149.

Rules, enforcement and evidence, continued

Trade coverage noted that sponsors share responsibility for clear disclosures (Food Dive, November 27, 2023).

Research on adolescents supports the rule's purpose. A study of 3,149 high school students in Taiwan found that full sponsorship disclosure helped teens recognize a post as an ad (Lin et al., PLOS One, May 27, 2026). Earlier work examined whether disclosures help younger and older teens notice when an influencer is paid (van Reijmersdal and van Dam, Journal of Youth and Adolescence, January 18, 2020).

 **Stop and think.** Who should make sure disclosures are clear: creators, brands or platforms?

Sources

Real source | Federal Trade Commission (FTC) | 2023

FTC Endorsement Guides (16 CFR Part 255)

Real source | Federal Trade Commission | December 3, 2024

Disclosures 101 for Social Media Influencers

Real source | Federal Trade Commission | November 14, 2023

FTC Warns Two Trade Associations and a Dozen Influencers About Social Media Posts Promoting Consumption of Aspartame or Sugar

Real source | Food Dive | November 27, 2023

FTC crackdown could change influencer marketing for food and beverages

Real source | PLOS One (Lin et al.) | May 27, 2026

Effects of social media sponsorship disclosure on adolescents' advertising literacy and purchase intention

Real source | Journal of Youth and Adolescence (van Reijmersdal & van Dam) | January 18, 2020

How Age and Disclosures of Sponsored Influencer Videos Affect Adolescents' Knowledge of Persuasion and Persuasion

This page continues page 149. The notes for both pages are on the sheet for page 149.

Look at the evidence

On your own Read each document. For each one, write what it shows and what it leaves out. About 8 minutes.

Evidence A | Email

The publisher's email

"Hi Gia, we love your book reviews! We'd be glad to send you a free copy of our spring novel for review. There's no obligation to post, but if you do, we'd appreciate a tag. Best, the publicity team"

Look closely: What did the publisher give, and what did it ask for?

What it shows

➤ A free product with "no obligation to post," and a request for a tag.

What it leaves out

➤ Any other relationship between Gia and the publisher.

Evidence B | Video script and caption

Gia's first cut

Spoken: "You guys, I have to tell you about this book because I literally could not put it down!" On-screen text: none. Caption below the video: "@publisher #booktok"

Look closely: Where in this video would a viewer learn about the free copy?

What it shows

➤ A sincere endorsement. The only link to the publisher is a caption tag.

What it leaves out

➤ The free copy. Nothing spoken or on screen names it.

⌚ Pacing

Full chapter: 8 min.

✂ Short on time: 7 min. Students fill in only the What it shows boxes.

💬 Say this

"Put your finger on the start of Gia's script. Where does it say the book was free?" — Wait for "nowhere." Then find the tag in the caption.

👁 Watch for

Misconception: Students count the caption tag as a disclosure. **Listen for:** "She tagged them, so it's disclosed." **Then:** Ask what the tag tells a viewer. It names the publisher; it never says the book was free.

📄 Support

- Give each document on its own half-page, with the email's key sentence enlarged.
- Read Caio's notes aloud. Explain that 0:00–0:03 means the first three seconds.
- **Cognates:** connection (conexión), material (material), recommendation (recomendación), relationship (relación), product (producto), opinion (opinión), audience (audiencia), video (video).

➡ Stretch

- Ask why Caio tests the video on mute, and which viewers a spoken-only disclosure would miss.

🔥 Heat check

■□□ Low.

Look at the evidence, continued

Evidence C | Edit notes

Caio's edit notes

"Watch once as a stranger, phone on mute. 0:00—0:03: does anything say free copy? Caption sits below the video; most people won't open it. Tag = brand name, not relationship."

Look closely: What does Caio want to test before uploading, and why the first three seconds?

What it shows

🔍 A sound-off test, and the point that a tag names a brand, not a relationship.

What it leaves out

🔍 How many of Gia's viewers watch on mute or open the caption.

Evidence D | Viewer comment

A comment on another creator's review

wait was this sponsored?? kind of feels like an ad now

Look closely: When does this viewer start to wonder about a sponsorship?

What it shows

🔍 Suspicion that arrives after the video can lower trust in the review.

What it leaves out

🔍 Whether that review was sponsored. It is about another creator.

What is still missing from the evidence?

🔍 Any other relationship with the publisher, what label the platform would show, how many viewers watch on mute, and what supports her strongest claims.

⌚ Pacing

Full chapter: 6 min.

✂ Short on time: 4 min. Read Evidence D aloud; skip its boxes.

💬 Say this

"Put your finger on the start of Gia's script. Where does it say the book was free?" — Wait for "nowhere." Then find the tag in the caption.

👁 Watch for

Misconception: Students count the caption tag as a disclosure. **Listen for:** "She tagged them, so it's disclosed." **Then:** Ask what the tag tells a viewer. It names the publisher; it never says the book was free.

📄 Support

- Give each document on its own half-page, with the email's key sentence enlarged.
- Read Caio's notes aloud. Explain that 0:00—0:03 means the first three seconds.
- **Cognates:** connection (conexión), material (material), recommendation (recomendación), relationship (relación), product (producto), opinion (opinión), audience (audiencia), video (video).

🔗 Stretch

- Ask why Caio tests the video on mute, and which viewers a spoken-only disclosure would miss.

🔥 Heat check

■□□ Low.

Key idea: material connections

On your own Read the key idea and the FTC guide. Then answer the question in the box. About 10 minutes.

An **endorsement** is a message that shares someone's opinion or experience of a product to promote it. Gia's video review is an endorsement, and her opinion in it is honest. A **material connection** is a relationship with a brand, like payment or a free product, that viewers might not expect. The free copy from the publisher is a material connection. Knowing about it gives viewers context, but it does not prove that Gia's opinion is false.

The Federal Trade Commission (FTC) is a federal agency. Its Endorsement Guides explain how a federal law against deceptive practices applies to endorsements. A **disclosure** is a clear statement that tells people about a relationship or fact they would want to know. For a video, the FTC says the disclosure belongs in the video itself, ideally both spoken and on screen. A tag in the caption only names the brand, and it sits below the video.

A disclosure answers one question: how did Gia get the book? Viewers can still ask what supports her claims about the book itself. A clear disclosure does not make every claim in a review accurate. Do not accuse a real creator of hiding a sponsorship based on a guess.

Professional standards

Real source | Law or regulation | Federal Trade Commission (FTC)

FTC Endorsement Guides (16 CFR Part 255): § 255.5 Disclosure of material connections

"They can include monetary payment or the provision of free or discounted products ... to an endorser, regardless of whether the advertiser requires an endorsement in return."

In plain words: The FTC says a free product can be a connection that reviewers must clearly disclose, even if the brand asked for nothing in return.

Question: The publisher's email says there is "no obligation to post." Does that change whether Gia has a connection to disclose?

Pacing

Full chapter: 10 min.

 Short on time: 8 min. Read both FTC rows. Skip In the news.

Say this

"The FTC counts free products even when the brand requires no review. What does that mean for Gia?" — Wait for: the email's "no obligation" does not change the connection.

Watch for

Misconception: Students treat the PRSA code and the FTC guides as the same kind of rule. **Listen for:** "Gia broke the PRSA code." **Then:** Say: "The PRSA code binds PRSA members. The FTC guides explain a federal law that reaches endorsers like Gia."

Support

- Read the quotation aloud. Point out the label: Law or regulation, not a code of ethics.

Stretch

- Use the second FTC row: where in the first three seconds would a viewer on mute learn the book was free?

Heat check

■□□ Low.

Professional standards, continued**Your answer**

The FTC text says ____, so ____.

→ The FTC text says free products count “regardless of whether the advertiser requires an endorsement in return,” so Gia has a connection.

In the news

Real source | NBC News | November 15, 2023

Influencers warned by FTC over ‘inadequate’ disclosures of artificial sweetener promotions

Real creators were warned for not clearly saying they were paid, the exact question this case asks.

Real source | ABC News | November 6, 2019

Popular YouTuber chimes in on federal product disclosure guide for influencers

A creator reacts to the FTC’s disclosure rules, showing how the guidance lands for people who actually post.

Notes

This page continues page 154. The notes for both pages are on the sheet for page 154.

Sort the evidence

On your own Follow each choice to its results. Then write whose view is missing. About 7 minutes.

Follow both choices forward. Which consequences can Gia control, which depend on viewers, and what test tells her the disclosure worked?

Post the first cut with only a brand tag in the caption

Sound-off viewers never learn the book was free

Who is affected

➡ Viewers deciding whether to buy or borrow the book

Disclose aloud and on screen in the first seconds

Viewers weigh the recommendation knowing the relationship

Who is affected

➡ Viewers deciding whether to buy or borrow the book

Some viewers may discount the review as an ad

Who is affected

Whose perspective is missing?

Whose view is missing from these documents? What would you ask them?

The view that is missing is _____. I would ask _____.

➡ The platform's. I would ask what label the platform itself would show, and whether a viewer on mute would see it.

⌚ Pacing

Full chapter: 7 min.

✂ Short on time: skip this page.

💬 Say this

“Follow each choice forward. Which results can Gia control, and which depend on viewers?” — Model the first chain together.

👁 Watch for

Misconception: Students read “some viewers may discount the review” as a reason not to disclose. **Listen for:** “Then she shouldn’t say it.” **Then:** Ask what happens when viewers find out later. Follow the chain that starts with the tag only.

📄 Support

- Let students write the letter of each result on the arrows before they write sentences.

🔥 Heat check

■□□ Low.

Practice: choose a response

On your own Choose the change that makes the relationship clearest. Then fix the two marked phrases. About 6 minutes.

Gia loves the novel the publisher sent her for free. Which change to her video makes the relationship clearest to viewers?

- ☐ A Tag the publisher in the caption.
- ☒ B Say and show at the start of the video that the publisher sent her the book for free.
- ☐ C Leave the video as it is, since the email said there was no obligation to post.

Why I chose it

➤ B. A names a brand, not a relationship, and C treats “no obligation” as no connection. Only B reaches a viewer on mute.

Improve a draft

A student's first draft

Okay you guys, I have to tell you about this book because I literally could not put it down!! ① #ad #booktok @publisher. The characters are so real and the ending destroyed me. I stayed up until 2 a.m. finishing it and then just sat there staring at the wall. Everyone needs to read this, trust me, ② it's the best book of the year and you won't regret it. Link is in my bio, go get it before everyone else does!

Rewrite each marked phrase so it says only what the evidence supports.

Rewrite phrase 1

➤ Hashtags in a caption are easy to miss. Say and show the free copy at 0:00.

Rewrite phrase 2

➤ Keep only what she knows: “I could not put this down.”

⌚ Pacing

Full chapter: 6 min.

✂ Short on time: skip this page.

💬 Say this

“Gia loves the book, and it was free. Which change makes that clearest?” — Take a vote before any discussion.

👁 Watch for

Misconception: Students choose C because the email said there was no obligation. **Listen for:** “They didn’t make her post, so it’s fine.” **Then:** Reread the FTC quotation. A free product counts even when no post is required.

📖 Support

- Read the three options aloud before students choose.

🌡 Heat check

■□□ Low.

➤ Answer key

A revised version: On screen and said aloud: “Quick heads-up: the publisher sent me this book for free to review.” Then: “Okay, you guys, I could not put this down. The two sisters felt real to me, and the ending caught me completely off guard. If you like slow-burn family stories, this one’s for you. If you need a fast plot, maybe not. I finished it in two nights.” Caption: “Publisher sent me a free copy for review. #ad #booktok.” The disclosure is in the first three seconds, readable without sound, and the claim is about my own reading.

Grades 11–12**Your task**

On your own Read the steps. Fill in the planner boxes before you start your draft. About 12 minutes.

Build a creator communications policy for the crew: when to disclose, how, and how to check it worked.

Use: FTC Disclosures 101, the FTC endorsement FAQ and case evidence.

You'll make: Policy, 400–500 words

Time: 60 minutes

- 1 Reread Evidence A, B and C. Note what the publisher gave and where the first cut names it.
- 2 Fill in the planner: when to disclose, how, how to check and guidance versus statute.
- 3 Draft the core of your policy on the Your draft page.
- 4 Include one step that tests a disclosure on a viewer before posting.
- 5 Write the full policy of 400 to 500 words in the online workspace or on paper.
- 6 Say that the policy guides the crew and is not legal advice.
- 7 Check your policy with the questions on the Check your work page.

Prefer typing? Scan to open the online workspace.

When the crew discloses

Disclose when ____.

👉 Disclose when a brand gives us money, a free product or a discount, even if it asks for nothing in return.

Case 8 | Your task | Grades 11–12 educator edition**🕒 Pacing**

Full chapter: 12 min.

✂ Short on time: 10 min. Fill in the guidance-and-statute box together.

💬 Say this

“A policy is for the next post, not this one. What should happen every time a brand sends something free?” — Push for who does what, and when.

👁 Watch for

Misconception: Students describe the guides as the law itself. **Listen for:** “The FTC law says you have to use #ad.” **Then:** Draw the chain: Congress, the FTC Act, the FTC, its guides, creators. Ask where the policy fits.

📎 Support

- Policy template
- Measurement ideas

🔗 Stretch

- Explain the legal concept: how FTC guides interpret the FTC Act’s ban on deceptive practices, without giving legal advice.

🔥 Heat check

■□□ Low.

📋 Standards

Common Core: RI.11–12.1; W.11–12.2; W.11–12.5; SL.11–12.1.c; SL.11–12.1.d.

C3 Framework: D2.Civ.6.9–12; D3.2.9–12.

The Case plan sheet gives each code in plain words.

How the crew discloses

How the crew checks it worked

Guidance and statute

Notes

[illegible]

OT Answer key

- Covers audience, channel and consistency
- Explains guidance vs. statute accurately
- Includes a measurement step
- Practical for a small creator team

- Covers audience, channel and consistency
- Explains guidance vs. statute accurately
- Includes a measurement step
- Practical for a small creator team

Your draft

On your own Write your draft in the boxes. Use your planner from the page before. About 28 minutes.

Your policy: purpose, when to disclose and how

🔗 **Crew disclosure policy.** This policy is for everyone in the crew who posts reviews or recommendations. It helps our viewers know when a brand is behind a post. It guides our choices; it is not legal advice. **When to disclose:** we disclose any relationship with a brand that could affect a recommendation. That includes payment, a free product or a discount, even when the brand says there is no obligation to post. **How to disclose:** we say it and show it in the first three seconds, in plain words, such as “the publisher sent me this free.” We repeat it in the caption. A tag or a hashtag alone does not count, because it names a brand, not a relationship.

Your policy: checking, consistency and the law

🔗 **How to check:** before anyone posts, a crew member who did not help make the video watches it once, on a phone, on mute. Then we ask one question: was the product free? If they have to think about it, we fix the cut. **Consistency:** the spoken line, the on-screen text and the caption use the same words, so every viewer gets the same message. **The law behind it:** Congress passed the FTC Act, which bans deceptive practices. The FTC’s Endorsement Guides explain how the agency applies that law to reviews and posts. The guides are guidance, not the statute itself.

🕒 Pacing

Full chapter: 28 min.

✂ Short on time: 24 min. Students draft the core sections in class and finish the full policy at home.

💬 Say this

“Write one sentence that a new crew member could follow on their first post.” — Check each policy for a testing step.

👁 Watch for

Misconception: The checking step is vague. **Listen for:** “We’ll make sure people understand.” **Then:** Ask who checks, when and how. Caio’s mute test is specific.

🔥 Heat check

■□□ Low.

🔗 Answer key

What to notice in the sample:

1. Applies the FTC rule that a free product counts even when nothing is required.
2. Explains why a caption tag is not a clear disclosure.
3. Includes a measurement step that tests the disclosure on a viewer.
4. States the guidance-versus-statute difference accurately.

Check your work

On your own Answer the Check your work questions and mark your level in each rubric row. Then write one change you made. About 8 minutes.

Does your policy say when to disclose, including free products?	☒ Yes	☐ No
Does it cover audience, channel and consistency?	☒ Yes	☐ No
Does it explain the FTC guides as guidance on the FTC Act?	☒ Yes	☐ No
Does it include a step that checks whether a disclosure worked?	☒ Yes	☐ No

How your work is scored

Mark one box in each row.

Skill	Beginning	Developing	Proficient	Advanced
Evidence	☐ No disclosure or claim support.	☐ Tag only.	☐ Names the relationship clearly.	☐ Names the relationship and supports the product claim.
Reasoning	☐ Treats opinion as a substitute for disclosure.	☐ Discloses but can't explain why.	☐ Explains why placement and clarity matter.	☐ Distinguishes opinion, relationship and product claim.
Audience & purpose	☐ Ignores viewers.	☐ Assumes viewers read captions.	☐ Works for sound-off viewers.	☐ Works across channels with consistent wording.
Revision	☐ No change.	☐ Adds a hashtag.	☐ Adds spoken and on-screen disclosure.	☐ Explains each placement choice for different viewers.

Pacing

Full chapter: 8 min.

 Short on time: 4 min. Students answer the four questions only; skip the rubric.

Say this

“Mark your level honestly. Then make one change and say why.” — Ask for one moved disclosure or one cut claim.

Watch for

Misconception: Students add a hashtag and call it done.

Listen for: “I added #ad.” **Then:** Point to the Revision row: a hashtag alone is the second level. Ask where a viewer on mute would see it.

Heat check

 Low.

Answer key

How to assess: The policy is scored for coverage of audience, channel and consistency, an accurate guidance-versus-statute explanation, a measurement step and practicality.

Proficient looks like:

- **Evidence:** Names the relationship clearly.
- **Reasoning:** Explains why placement and clarity matter.
- **Audience & purpose:** Works for sound-off viewers.
- **Revision:** Adds spoken and on-screen disclosure.

This image shows a single sheet of white paper with horizontal blue lines, resembling notebook paper. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

Questions to discuss

On your own Write a short answer to each question. Then finish My take. About 10 minutes.

- 1 Would knowing the book was free change how much you trust Gia's review? Why or why not?

➤ It lowers trust only if she hides it. Said up front, the free copy is context. Found later, as in the viewer comment, it looks like concealment.

- 2 Some viewers may treat a review with a disclosure as just an ad. How could Gia keep their trust?

➤ By separating the relationship from the claim. An early disclosure plus claims she can support, like finishing it in two nights, answers both questions viewers have.

- 3 Who should make sure disclosures are clear: creators, brands or platforms?

➤ Mostly creators, because they control what viewers see first. The FTC guides apply to endorsers and advertisers, so brands share the duty.

My take

My claim: ____.

➤ Gia should disclose the free copy at 0:00, spoken and on screen, and cut claims she cannot support.

The best evidence is ____, because ____.

➤ The FTC text, because it counts a free product even when no post is required.

Pacing

Full chapter: 10 min.

✂ Short on time: skip this page.

Say this

“Answer with a detail from the evidence, not with a real creator you follow.” — Post the question numbers and take one answer per question.

Stretch

- Ask what a disclosure checklist for a school media club would include, and who would check it.
- Going further: What does a viewer need to know about how Gia got the book? Plan one way to check that viewers understood the disclosure. A view count cannot tell you that.
- Going further: Design two versions of a sponsored post, with the disclosure in a different place in each. Keep the relationship equally clear in both versions.
- Going further: Find the line in the evidence that shows the book was free. Before you call any real post sponsored, look for that kind of evidence. Do not accuse a real creator based on a guess.
- Going further: The next time you see a recommendation, look for a disclosure in the video itself. Talk with a trusted adult before you accept any brand deal. If you post reviews, practice a clear spoken line, such as “They sent me this for free.”
- Analyze three real posts from brands' own accounts (not individual creators) for disclosure
- Compare FTC guidance with another country's advertising standards body

My take, continued

Someone who disagrees might say ____.

- A disclosure makes an honest review look like an ad.

The limit of the evidence is ____.

🔑 No document shows how many of her viewers watch on mute.

I would change my mind if ____.

🔑 The publisher had not sent the book for free.

Notes

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This page continues page 163.

Heat check

■ ■ □ **Question 2: Medium.** Students may name real creators they believe hide sponsorships.

Cool-down: Say: “We are talking about Gia, not real creators.” Return to the viewer comment, which is about a creator.

Talk about this case at home

Case 8: Is it a recommendation or an ad?

In this case, a publisher sends Gia a free novel, and her video review does not say the book was free. Your student read the email and the video script, then rewrote the opening so viewers learn about the free copy.

Questions to talk about

- 1 How can you tell when a video review is also an ad?
- 2 Where in a video would you look for a note that a product was free?
- 3 Why might a review still be honest if the reviewer got the product for free?

Nobody needs to share personal stories or private information to talk about this case.



See the case online.

Case 8 | Talk about this case at home | Grades 11–12 educator edition

⌚ Pacing

At home: this page takes no class time.

💬 Say this

“Take this page home or read it with someone you trust.” —
Nobody needs to share a personal story to complete it.