SmartSuite

Framework / Privacy / Global Privacy Regulations

COPPA (15 U.S.C. §§6501–6506)

COPPA requires operators of services directed to children under 13, or with actual knowledge of a child user, to get verifiable parental consent before collecting a child's data.



What it is

The Children's Online Privacy Protection Act of 1998 (COPPA, 15 U.S.C. 6501 to 6506) and the COPPA Rule (16 CFR Part 312) require operators of websites and online services directed to children under 13, and operators with actual knowledge that they collect a child's personal information, to give parents notice and obtain verifiable parental consent first. Congress enacted the Act on October 21, 1998, and the Rule took effect on April 21, 2000.

The Federal Trade Commission (FTC) issues and enforces the Rule, and state attorneys general can bring civil actions under 15 U.S.C. 6504. A violation is treated as a violation of an FTC trade regulation rule on unfair or deceptive acts or practices (16 CFR 312.9). The Rule covers commercial websites and online services, including apps. Nonprofit entities exempt from section 5 of the FTC Act are outside the definition of operator (section 312.2).

At a glance

PUBLISHER Federal Trade Commission (FTC)	TYPE Regulation	VERSION COPPA (15 U.S.C. 6501-6506) and the COPPA Rule (16 CFR Part 312), as amended April 22, 2025 (90 Fed. Reg. 16918; effective June 23, 2025; compliance date April 22, 2026)
EFFECTIVE April 21, 2000 (Rule); amendments effective June 23, 2025	DOMAIN Privacy	FAMILY Global Privacy Regulations
REGION United States	ADOPTION MODEL Regulatory Compliance	IMPLEMENTATION COMPLEXITY Moderate

Source: ftc.gov/legal-library/browse/rules/childrens-online-privacy-protection-rule-coppa

Why it matters

- **Clear coverage test** The Rule applies to operators of websites or online services directed to children and to any operator with actual knowledge that it collects personal information from a child (section 312.3). A mixed audience service may screen age in a neutral manner (section 312.2).
- **Consent that can be proven** An operator must obtain verifiable parental consent before any collection, use or disclosure, using a method reasonably calculated to ensure the person consenting is the child's parent (section 312.5(b)).
- **Parents stay in control** A parent can review the information collected, refuse further use or collection and direct deletion, and the operator must provide a means that is not unduly burdensome (section 312.6).
- **Security and retention are written duties** Since the 2025 amendments the Rule requires a written information security program (section 312.8(b)) and a written data retention policy (section 312.10).

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How SmartSuite supports COPPA

Children's Data Inventory

Record each category of personal information collected from children, including persistent identifiers, the purpose and the retention timeframe (16 CFR 312.2 and 312.10).

Direct Notice and Consent Evidence

Track the direct notice sent, the parental consent method used, the date, and any separate consent for disclosure to third parties (sections 312.4 and 312.5).

Parent Review and Deletion Requests

Run parent requests to review information, refuse further collection or direct deletion, with identity checks and response dates (section 312.6).

Third-Party Assurances

Hold the written assurances and due diligence for each service provider or third party that collects or receives children's data (section 312.8(c)).

Information Security Program

Assign the coordinating employees and schedule the annual risk assessment, safeguards, testing and program evaluation the Rule requires (section 312.8(b)).

Retention Policy and Compliance Reporting

Keep the written retention policy and deletion timeframes with open gaps in one view for internal reviews (section 312.10).

Common framework mappings

APEC PF | CCPA/CPRA | GDPR | ISO 27701 | LGPD | NIST Privacy Framework v1.0 | PIPEDA

Official resources

COPPA Rule page (FTC)

The FTC's page for the Children's Online Privacy Protection Rule, 16 CFR Part 312, with rule text and policy statements.

ftc.gov/legal-library/browse/rules/childrens-online-privacy-protection-rule-coppa

Complying with COPPA: Frequently Asked Questions (FTC)

FTC staff answers on coverage, notice, consent and security under the COPPA Rule.

ftc.gov/business-guidance/resources/complying-coppa-frequently-asked-questions

COPPA Six-Step Compliance Plan for Your Business (FTC)

FTC business guidance on checking coverage, writing notices, getting consent and securing data.

ftc.gov/business-guidance/resources/childrens-online-privacy-protection-rule-six-step-compliance-plan-your-business

COPPA Rule Final Amendments, April 22, 2025 (Federal Register)

The final rule text and FTC analysis, with effective and compliance dates.

federalregister.gov/documents/2025/04/22/2025-05904/childrens-online-privacy-protection-rule

Frequently asked questions

Who must comply with COPPA?

Operators of commercial websites and online services, including apps, that are directed to children under 13, and operators of other services that have actual knowledge they collect personal information from a child (16 CFR 312.3). Nonprofit entities exempt from section 5 of the FTC Act are outside the definition of operator (section 312.2). The FTC enforces the Rule, and state attorneys general can sue under 15 U.S.C. 6504.

What changed in the 2025 COPPA Rule amendments, and when must operators comply?

The FTC published the final rule on April 22, 2025 (90 Fed. Reg. 16918). It took effect June 23, 2025, and operators had until April 22, 2026 to comply, with earlier dates for safe harbor program duties in sections 312.11(d)(1), (d)(4) and (g). Changes include separate consent for disclosure to third parties (section 312.5(a)(2)), a written information security program (section 312.8(b)), a written retention policy (section 312.10) and biometric and government-issued identifiers in the definition of personal information.

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How does an operator obtain verifiable parental consent?

Any method must be reasonably calculated, in light of available technology, to ensure the person giving consent is the child's parent (section 312.5(b)). The Rule lists methods such as a signed form, a payment card transaction, a toll-free call, video conference, a government ID check, knowledge-based authentication and a photo ID matched to a face image. An operator that does not disclose children's information may use email or text plus confirmation steps.

What must a COPPA information security program contain?

Section 312.8(b) requires a written program with safeguards suited to the sensitivity of the data and the operator's size. The operator designates employees to coordinate it, assesses internal and external risks at least annually, designs safeguards for those risks, tests and monitors them, and evaluates and updates the program at least annually. It must also obtain written assurances from third parties that receive children's data (section 312.8(c)).

Does COPPA apply to a general audience site that may have child visitors?

It applies once the operator has actual knowledge that it collects personal information from a child (section 312.3). A mixed audience service, which is directed to children but does not target them as its primary audience, must determine age with a neutral screen before collecting personal information, other than for limited purposes in section 312.5(c). It is not deemed directed to children for any visitor not identified as under 13 (section 312.2).

License included / downloadable: Yes The Act and the Rule are U.S. federal law, published free by the Federal Trade Commission, the Federal Register and the Code of Federal Regulations, and are included with the platform for reference.

Full framework page and mappings: smartsuite.com/frameworks/coppa-childrens-online-privacy-protection-act