The State of Play: Are Current VPC Methods Fit for Purpose?

In 1998, Congress enacted the Children’s Online Privacy Protection Act (COPPA) in an effort to keep kids safe online. Among other things, COPPA requires operators of websites, games, and mobile applications to obtain Verifiable Parental Consent (VPC) before collecting personal information from children under the age of 13. This infographic provides an overview of the challenges that come hand-in-hand with implementing COPPA’s VPC requirement, which unintentionally has fallen short of meeting COPPA’s goal of protecting children online.

**Existing FTC Approved VPC Methods**

- **Signed Form**: Print form, complete information and return by mail, fax or scan
- **Phone Call**: Call a toll free number
- **Video Conference**: Connect via video conference to a call center
- **Photo Comparison**: Provide scan of Government ID and second photo taken with a phone or web camera for comparison and validation via facial recognition
- **Database**: Provide Government ID identifier (Driver’s license ID number or SSN) for validation against a database
- **Credit/Debit Card**: Provide credit/debit card number, bank processes a small monetary transaction (in US) to verify card holder identity.
- **Knowledge-Based Questions**: Answer a set of knowledge-based questions pulled from publicly available information (ie: In what city were you born?)
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**PARENT FRICTION POINTS**

- **Convenience**: Time and investment of tools required become "too much"
- **Efficacy**: This does not always produce appropriate results and leads to frustration
- **Accessibility**: Not all parents have equal or easy access to the tools required
- **Security / Privacy**: Concern with providing this personal information to unknown service providers
- **Hesitancy**: The method gives parents pause. "Why do you need this info?"

**Let’s Solve This!**

FPF is calling on industry, advocates, and academics to help identify possible solutions to untangle these challenges and remove friction from the VPC flow.

**Possible Outcomes**

- Child plays with permission
- Adult Provides Consent
- Approved methods confirm adult status, not parent relationship
- Child lies about age, and potentially accesses age-inappropriate content
- Child prevented from engaging with an online experience
- FPC Abandoned

Suggestions for improvements, mechanisms, and methods include incorporating the use of mobile phones for greater flexibility, leveraging major platforms to facilitate compliance, considering alternatives to credit cards, and exploring emerging technologies including implementing age assurance tools.

**The FTC allows Operators to petition for new methods to be approved, and allows Safe Harbors to approve new methods.**

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