

App Store Accountability Act Comparison Chart

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Three states enacted “App Store Accountability Acts” (ASAAs) in 2025—Utah, Texas, and Louisiana. These laws impose significant obligations on **app store providers** and **app developers**, establishing a system of user age verification and parental consent for minors at the app store level. The obligations these laws place on app store providers and app developers are broadly similar but include important distinctions that will shape how these laws are ultimately complied with. This chart compares the key terms, scope, and core obligations of these laws, noting the bespoke aspects of these diverging legislative models. An Appendix on page 19 provides additional information about Developer APIs publicly released by app stores in advance of these laws taking effect. Both Louisiana ([HB 977](#)) and Utah ([HB 498](#)) also amended their respective ASAA laws in 2026 diverging them further from Texas, and those changes have been captured in this comparison chart. In the 2026 legislative season, Alabama also enacted an ASAA framework that is not included in this chart, but largely tracks with Utah’s and Louisiana’s law as amended.

| | Utah SB 142 & HB 498 | Texas SB 2420 | Louisiana HB 570 & HB 977 | Comparison & Analysis |
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| Key Terms & Scope | | | | |
| App Store Provider | <p>A person that owns, operates, or controls an app store that allows users in Utah to download apps onto a mobile device. [§ 13-75-101(7)]</p> <p>An “app store” is a publicly available website, software application, or electronic service that allows users to download apps from third-party developers onto a mobile device. [§ 13-75-101(6)]</p> | <p>A publicly available Internet website, software application, or other electronic service that distributes software applications from the owner or developer of a software application to the user of a mobile device. [§ 121.002(2)]</p> | <p>A publicly available website, software application, or electronic service that allows users to download applications from third-party developers onto a mobile device or connected device. [§ 1771(7)]</p> | <p>Though all three laws similarly define “App Store Provider,” Utah limits its definition to app stores that allow “users <i>in Utah</i>” to download apps onto a mobile device. Texas and Louisiana do not similarly indicate explicit jurisdictional limits in their definitions of covered entities, but do incorporate jurisdictional hooks throughout substantive provisions. Additionally, in amendments enacted in 2026, Louisiana added services that allow app downloads onto “connected devices” to its definition.</p> |
| Developer & | <p>A person who owns or controls an app made available in Utah through an app store. [§ 13-75-101(9)]</p> | <p>No direct definition of the term “developer;” however, the section containing developer obligations, § 121.051, includes language</p> | <p>A person who owns or controls an application made available through a covered application store in Louisiana. [§ 1771(9)]</p> | <p>Texas’s notable omission of explicit definitions for “developer” and “application” may introduce ambiguity regarding the scope of covered</p> |

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| Application | “App” is a software application or electronic service that a user may run or direct on a mobile device. [§ 13-75-101(5)] | stating that the “subchapter applies only to the developer of a software application that the developer makes available to users in [Texas] through an app store.” | “Application” is defined as a software program that is designed to run on a connected device or a mobile device. [§ 1771(4)] | developers and applications under the law. |
| Minor | Anyone younger than 18 who has not been emancipated or married. [§ 13-75-101(12)] | Anyone under 18 who has not had the disabilities of minority removed for general purposes. [§ 121.002(3)] | Anyone under 18 who has not been emancipated or married. [§ 1771(10)] | All three laws include exemptions for minors who are emancipated or married. |
| Age Category | One of the following categories of individuals based on age: <ul style="list-style-type: none"> • Child = < 13 years old • Younger teenager = 13 - 16 • Older teenager = 16 - 18 d • Adult = 18+ [§ 13-75-101(2)] | Information collected by the owner of an app store to designate a user based on the following age categories: <ul style="list-style-type: none"> • Child = < 13 years old • Younger teenager = 13 - 16 • Older teenager = 16 - 18 • Adult = 18+ [§ 121.002(1)] | One of the following categories of individuals based on age: <ul style="list-style-type: none"> • Child = < 13 • Younger teenager = 13 - 16 • Older teenager = 16 - 18 • Adult = 18+ [§ 1771(1)] | Texas is the only state that defines “age category” as the information collected by an app store for the purposes of designating a user within the appropriate age category—raising important implications for the information that app stores must share with developers. In contrast, both Utah and Louisiana define “age category” to refer to the age brackets themselves and include separate definitions for “age category data” which encompasses the data collected for the verification process to assign users to designated age brackets. |
| Parent Account | An account with an app store that is established by an individual who is not a minor, as determined through the app store provider’s age verification methods, and may be affiliated with one or more minor accounts. [§ 13-75-101(17)] | An account may be affiliated with a minor account as a “parent account” after the app store owner uses a commercially reasonable method to verify that the account belongs to an individual who: <ol style="list-style-type: none"> (1) The app store has verified is an adult | An account with an app store that is established by an individual who is determined to be at least 18 years old through the app store provider’s age verification methods and may be affiliated with one or more minor accounts. [§ 1771(16)] | Significantly, Texas diverges by requiring that app stores verify that the adult in question “has legal authority to make a decision on behalf of the minor” for account affiliation. Such a broad requirement to verify legal guardianship or parentage in order for a parent to create an |

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| Parent Account (Cont'd) | | <p>under the law's age verification requirements; and,</p> <p>(2) Has legal authority to make a decision on behalf of the minor with whose account the individual is seeking affiliation.</p> <p>A parent account may be affiliated with multiple minors' accounts. [§ 121.022(b) & (c)]</p> | | <p>affiliated account and provide consent for a minor to download an app is likely to cause an additional layer of friction in a minor's ability to access online services through a mobile application.</p> |
| Family Account Application | N/A | N/A | <p>An application that: (a) offers subaccounts or profiles; (b) requires a paid subscription or account creation with payment method verification as the application's primary business model; (c) restricts individuals under eighteen from creating accounts; and (d) verifies that the primary account holder is an adult by using "commercially available methods that are reasonably designed to ensure accuracy." [§ 1771(10)]</p> | <p>This definition and associated carveouts from application (as indicated below) are new additions incorporated in 2026 amendments.</p> <p>Note: these amendments aim to reconcile the goals of the legislation with the operational realities of apps that rely on family or shared accounts, such as streaming services. Utah's 2026 amendment originally included a definition and carve-outs for "family account applications," but this language was removed before enactment.</p> |
| Pre-Loaded or Pre-Installed Applications | <p>An app, or portion thereof, that is present on a mobile device at the time of purchase, initial activation, or first use by a consumer. This term includes: an app installed or partially installed by the device manufacturer, a wireless service provider, a retailer, or any other</p> | N/A | <p>An app that is present on a mobile device at the time of purchase, initial activation, or first use of the device by a consumer.</p> <p>This term does not include: core operating system functions, essential device</p> | <p>This definition and the associated obligations are new additions incorporated by 2026 amendments. These changes are intended to address potential First Amendment deficiencies identified in a December 2025 preliminary injunction ruling finding that the exclusion of pre-loaded apps from the scope of</p> |

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| | <p>party; and browsers, search engines, and messaging apps.</p> <p>This term does not include: core operating system functions; essential device drivers; apps necessary for basic device operation (i.e., phone apps, settings apps, or emergency service apps); or security or system maintenance apps essential to device functionality. [§ 13-75-101(19)]</p> | | <p>drivers, basic-device operations, essential phone apps, settings apps, emergency services apps, or security or system maintenance apps essential to device functionality. [§ 1771(18)]</p> | <p>Texas’s obligations suggested that the law was a content-based regulation of protected speech.</p> |
| Significant Change | <p>A material modification to an app’s terms of service or privacy policy that: (a) changes the categories of data collected, stored, or shared; (b) alters the app’s age rating or content descriptions; (c) adds in-app purchases where none were previously present in the app; (d) introduces ads where no ads were previously present in the app. [§ 13-75-101(20)]</p> | <p>A change is significant if it: (a) changes the categories of data collected, stored, or shared; (b) affects or changes the rating assigned to the software application or the content or elements that led to that rating; (c) adds new monetization features (i.e., in-app purchases or advertisements); (d) materially changes the app’s functionality or user experience. [§ 121.053(b)]</p> | <p>A material modification to an app’s terms of service or privacy policy that: (a) changes the categories of data collected, stored, or shared; (b) alters the app’s age rating or content descriptions; (c) adds new monetization features (i.e., in-app purchases or ads); or (d) materially changes the app’s functionality or user experience. [§ 1771(19)]</p> | <p>Texas may have a lower threshold for triggering renewed notice and consent than Utah and Louisiana due to its broader definition that a change “affects or changes” the rating assigned or the content or elements that led to that rating.</p> |
| Age Rating | <p>A classification that provides an assessment of the suitability of an app’s content for different age groups. [§ 13-75-101(4)]</p> | <p>No explicit definition provided, but, § 121.056(b)(1) states developers are not liable for violating the age rating requirement if they use “widely adopted industry standards” to determine the rating and specific content under the law.</p> <p>The law also provides that these</p> | <p>A classification that provides an assessment of the suitability of an app’s content for different age groups. [§ 1771 (3)]</p> | <p>Texas does not have an explicit definition for age rating like Utah and Louisiana; however, it does include language in its substantive requirements that permits developers to use “widely adopted industry standards” to determine an app’s age rating.</p> |

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| Age Rating (Cont'd) | | ratings should: <ol style="list-style-type: none"> 1) Be assigned by developers based on age categories in § 121.021(b). Developers must provide each app store with the rating and the elements that led to the rating [§ 121.052(b); [§121.023 (1)] 2) Be displayed on each app store available for download or purchase in the app store, including elements that led to the rating [§121.023 (2)] 3) Be disclosed to parents of minors clearly in the app store [§ 121.052(b)] | | |
| Personal Data | <i>While the law does refer to “personal age verification data,” it does not specifically define what this means or includes.</i> | Means any information, including sensitive data, that is linked or reasonably linkable to an identified or identifiable individual. The term includes pseudonymous data when the data is used by a person who processes or determines the purpose and means of processing the data in conjunction with additional information that reasonably links the data to an identified or identifiable individual. This term does not include deidentified data or publicly available information. [§ 121.002(5)] | <i>While the law does refer to “personal age verification data,” it does not specifically define what this means or includes.</i> | Only Texas defines “personal data” to expressly identify what kinds of data are protected and subject to use limitations under its law. Texas’s definition of personal data follows the standard definition of personal data found in most privacy laws. Utah’s and Louisiana’s omission of personal data definitions may create ambiguity around the scope of protected personal data in these laws. |

App Store Obligations

| | <p style="text-align: center;">Utah <u>SB 142 & HB 498</u></p> | <p style="text-align: center;">Texas <u>SB 2420</u></p> | <p style="text-align: center;">Louisiana <u>HB 570 & HB 977</u></p> | <p style="text-align: center;">Comparison & Analysis</p> |
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| <p style="text-align: center;">Age Verification</p> | <p>Providers must request age information from the individual at account creation (or within 12 months of the effective date for existing accounts) and verify a user’s age category using “commercially available methods that are reasonably designed to ensure accuracy.” For minors, vouching, or affirmative age attestation by a parent together with other age information collected as part of account creation or use is a commercially available method. [§ 13-75-201(1)(a)]</p> | <p>When an individual in Texas creates an app store account, providers must implement “commercially reasonable methods of verification to verify the individual’s age category.” [§ 121.021]</p> | <p>Providers must request age information from the individual at account creation and “verify the individual’s age category using commercially available methods that are reasonably designed to ensure accuracy,” including, but not limited to, a means of verification provided through the use of a real-time age verification system authorized by the commissioner of the Office of Motor Vehicles. [§ 1772(A)(1)(b)(i)]</p> <p>For individuals under the age of 18, “vouching,” or age attestation by someone reasonably believed to be a parent or legal guardian of a minor, is a commercially available method, along with other information collected in the ordinary course of account creation or use.</p> | <p>All three laws require app stores to conduct age verification to determine the age category of the individual at account creation. Significantly, none of the laws have any <i>explicit</i> requirements regarding age verification for existing accounts.</p> <p>Utah and Louisiana both require that app stores use “commercially available methods reasonably designed to ensure accuracy” when conducting age verification. However, neither law defines what “accuracy” means nor authorizes rulemaking authority to provide further guidance on the term. They also explicitly allow vouching as a commercially reasonable method for complying with the law’s age assurance requirements. This provision also states that an individual’s vouched age is commercially reasonable when provided “along with other information collected in the ordinary course of account creation or use.” It is unclear what the impact of this additional language is on the vouching process or how it should be factored into an entity’s compliance approach.</p> <p>Uniquely, Louisiana’s law states that a “real-time age verification system authorized under the Commissioner of Motor Vehicles” would be a compliant method. This inclusion appears to be</p> |
| <p style="text-align: center;">Age Verification (Cont’d)</p> | | | | |

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| | | | | <p>a reference to Louisiana’s state-wide digital ID system known as the “LA Wallet,” which is a system only the state of Louisiana currently has in place.</p> |
| <p style="text-align: center;">Parental Consent & Account Affiliation</p> | <p>Requires minor accounts to be affiliated with parent accounts and obtain parental consent from affiliated parent account holders for a minor to download an app, purchase an app, or make in-app purchases.</p> <p>To obtain consent from a minor’s parent, an app store must provide a parental consent disclosure that includes:</p> <ol style="list-style-type: none"> (1) the age rating of the app or in-app purchase; (2) the content description of an app or in-app purchase (if available) (3) a description of the user’s personal data collected or shared by the app; and, (4) the methods implemented by the developer to protect a user’s personal data. [§13-75-101(19)] | <p>Requires minor accounts to be affiliated with parent accounts and obtain parental consent from affiliated parent account holders for a minor to download an app, purchase an app, or make in-app purchases. [§ 121.022]</p> <p>To obtain consent from a minor’s parent, app stores must:</p> <ol style="list-style-type: none"> (1) Disclose the specific app or purpose for which consent is sought, the age rating as assigned under the law, the specific content or elements that led to the rating, the nature of any collection, use, or distribution of personal data through the application or purchase, any measures taken by the developer to protect the personal data of users; and, (2) Give the parent or guardian a clear choice to give or withhold consent for the download or purchase. [§ 121.022(f)] | <p>Requires minor accounts to be affiliated with parent accounts and obtain verifiable parental consent from affiliated parent account holders for a minor to download an app, purchase an app, access a pre-loaded application, or make in-app purchases. [§ 1772(2)(b)]</p> <p>To obtain verifiable parental consent under the law, an app store provider must provide a parent or legal guardian (that has been verified to be over the age of 18) with a parental consent disclosure and obtain affirmative consent. A parental consent disclosure includes:</p> <ol style="list-style-type: none"> (1) The age rating of the application or in-application purchase; and, (2) The content description of the application or in-application purchase, which may include a description of the personal data that would be collected and shared | <p>All three states require parental account affiliation with minor accounts, parent consent for minor app downloads or purchases and for in-app purchases, and that certain disclosures are made to parents when obtaining consent. Louisiana takes a step further in its 2026 amendments, requiring parent account affiliation and consent prior to a minor accessing a pre-loaded app for the first time. Utah contains a similar requirement related to pre-installed apps and developer data sharing, but does not require parent account affiliation for access to pre-installed apps as noted below.</p> <p>Each state’s consent disclosure requirements are also similar by generally requiring disclosure of app ratings, data collection and sharing practices, and developer mitigation measures. However, Texas is more prescriptive by requiring app stores to include additional details on the specific content or elements that led to an app rating, and the nature of personal data use in addition to data collection and sharing practices.</p> <p>Texas also includes a unique provision</p> |

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| Parental Consent & Account Affiliation (Cont'd) | | <p>NOTE: App store owners are prohibited from obtaining blanket consent to authorize multiple purchases or downloads. [§ 121.026 (3)]</p> <p><i>Reminder: Texas requires that app stores must verify that the individual claiming to be a parent for the purposes of establishing an affiliated parent account has legal authority to make a decision on behalf of the minor with whose account the individual is seeking affiliation.</i></p> | <p>by the application, as well as the methods a developer implements to protect a user’s personal data. [§ 1771(17) & (20)]</p> | <p>prohibiting app store owners from obtaining a blanket consent to authorize multiple purchases or downloads.</p> |
| Significant Changes | <p>Must notify account holders of “significant changes” in an app, as indicated by developers. For minor accounts, app stores must notify the affiliated parent account and obtain renewed verifiable parental consent for a minor’s continued use of the app. [§ 13-75-201(1)(c)]</p> | <p>Must notify parent account holders of “significant changes” in an app, as indicated by developers, and obtain renewed parental consent for minors’ continued use of an app following a significant change. [§ 121.022(g)]</p> <p><i>Note: Within the developer requirements for significant changes (see below), the law requires that notice is provided to app stores “before” the changes are implemented. It is unclear if or how that qualifier impacts app store obligations.</i></p> | <p>Must notify users of “significant changes”, as indicated by developers. For minor accounts, app stores must notify the affiliated parent account and obtain renewed verifiable parental consent for a minor’s continued use of the app. [§ 1772(3)]</p> | <p>Both Utah and Louisiana seemingly require that notices for significant changes to the app must be sent to all users or account holders, regardless of age category. For minor accounts, the added step of renewed parental consent for continued use of the app by a minor user is required.</p> <p>In contrast, Texas seems to only require that notice of significant changes be provided to parent account holders affiliated with minor accounts for the purposes of obtaining renewed consent for a minor’s continued use of the service.</p> |
| | Must share age category and | Must share age category and | Must share age category and | Requirements for data sharing with |

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| Data Sharing with Developers | <p>parental consent data with app developers, including notices when a parent has withdrawn consent for a minor to continue using an app. [§ 13-75-201(1)(d) & (e)]</p> <p>For pre-installed apps, must provide available age category information in response to a request from a developer; and take reasonable measures to facilitate verifiable parental consent for use of the app in response to a request from the developer. [§ 13-76-201(g)]</p> <p>Note: An app store provider would be required to prevent minor accounts from downloading or purchasing the developer’s apps, if requested by the developer. [§ 13-76-202(6)]</p> | <p>parental consent data with app developers, including notices when a parent has withdrawn consent for a minor to continue using an app. [§ 121.022(e)(2); § 121.024]</p> | <p>parental consent data with app developers, including notices when a parent has withdrawn consent for a minor to continue using an app. [§ 1772(4) & (5)]</p> | <p>developers are generally consistent. However, since Texas’s definition for “age category” includes both a user’s assigned age bracket and the information used to assign a user to that age bracket—i.e., a user’s personal data collected for age verification, app stores must proactively send that information to developers when a user downloads an app.</p> <p>Additionally, Utah requires that app store providers share available data on user age category information and parental consent when a user accesses a pre-installed app for the first time. While Louisiana requires a minor’s account to be affiliated with a parent account before accessing any pre-installed app for the first time; Utah has no such requirement.</p> |
| Personal Data Protection | <p>Must protect personal age verification data by:</p> <ul style="list-style-type: none"> (a) limiting collection and processing to data necessary for verifying a user’s age, obtaining parental consent, or maintaining compliance records; and, (b) transmitting personal age verification data using industry-standard encryption protocols | <p>Must also protect the personal data of users when fulfilling these requirements by:</p> <ul style="list-style-type: none"> (1) limiting the collection and processing of personal data to the minimum amount necessary for verifying the age of an individual, obtaining parental consent, and maintaining compliance records | <p>Must also protect the personal data of users when fulfilling these requirements by:</p> <ul style="list-style-type: none"> (a) limiting the collection and processing of personal data to the minimum amount necessary for verifying the age of an individual, obtaining parental consent, and maintaining compliance records | <p>All three laws impose the same requirements on app stores concerning the protection of personal data collected for age verification and parental consent, which generally involves data minimization and utilizing industry-standard encryption protocols that ensure data integrity and confidentiality during transmission.</p> |

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| Personal Data Protection (Cont'd) | <p>that ensure data integrity and confidentiality. [§ 13-75-201(1)(f)]</p> | <p>(2) Transmitting personal data using industry-standard encryption protocols that ensure data integrity and confidentiality. [§ 121.025]</p> | <p>(b) Transmitting personal data using industry-standard encryption protocols that ensure data integrity and confidentiality. [§ 1772(A)(6)]</p> | |
| Developer Obligations | | | | |
| Age Verification and Parental Consent Data Sharing | <p>Must verify through the app store’s data sharing methods, the age category of users located in the state, and whether consent has been obtained for minor accounts. [§ 13-75-202(1)(a)]</p> <p>Must request personal age verification data or parental consent information when:</p> <ol style="list-style-type: none"> (1) a user downloads or purchases an app; (2) implementing a significant change to the app; (3) a user launches a pre-installed app for the first time; or, (4) complying with other applicable laws or regulations. [§ 13-75-202(1)(c)] | <p>Must access current information on the age category assigned and whether consent has been obtained for minors. [§§ 121.021(4); 121.054]</p> <p><i>Note: An age category includes information used to assign the category to the user, presumably the user’s personal data.</i></p> <p>Developers must also delete personal data provided by an app store after completion of required verification. [§ 121.055]</p> | <p>Must verify through the covered application store’s data sharing methods the age category of users located in this state and, if app store data reveals the user is a minor, whether verifiable parental consent has been obtained. [§ 1773(A)(1)]</p> <p>If the data shared from the app store reveals the user is a minor, the developer must require the minor account to be affiliated with a parent account and must obtain parental consent from the affiliated parent account holder before a minor can download or purchase apps or make in-app purchases. [§ 1773(A)(2)]</p> <p>Note: If the developer has actual knowledge that internal information is more accurate than the provided age signal, the developer may rely on that</p> | <p>All three laws generally require app developers to access or “verify” a user’s age category information through an app store’s data sharing method. This step is unnecessary for developers in Texas because, by definition, the age category shared by the app store already includes the information used to assign a user to that age category.</p> |

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| Data Sharing (Cont'd) | | | internal information instead of the age signal. [§ 1773(C)(2)] | |
| Additional Requests for Personal Age Verification or Parental Consent Data. | <p>In addition to the requirements to request personal age verification data for compliance outlined above, developers may request age verification data or parental consent:</p> <ul style="list-style-type: none"> (a) no more than once during each 12-month period to verify the accuracy or continued account use within the verified age category; [13-75-202(2)(a)] (b) when there is “reasonable suspicion” of account transfer or misuse outside of the verified age category; and, (c) at the time the user creates a new account with the developer. [13-75-202(2)] | <p><i>The statute does not specify how a developer may request age category data for purposes other than those explicitly required by statute for age verification and parental consent.</i></p> | <p>In addition to the requirements to request personal age verification data for compliance outlined about, developers may request age verification data or parental consent: [§ 1773(B)]</p> <ul style="list-style-type: none"> (1) no more than once during a twelve-month period to verify the accuracy of user age verification data or continued account use within the verified age category; (2) when there is “reasonable suspicion” of account transfer or misuse outside of the verified age category; and, (3) at the time the user creates a new account with the developer. | <p>Utah and Louisiana provide developers with additional purposes for which they may request personal age verification data about a user from an app store. These optional requests for personal data are generally used to verify accuracy of user age, prevent account transfer or misuse, and to provide an additional check when a user creates a new developer account. Texas’s law omits these optional requests.</p> |
| Age Ratings | <p><i>No explicit requirements for the creation of age ratings. It appears that if they are available in the app store from a developer, then they must be used to fulfill parental consent</i></p> | <p>Must provide age ratings for each application and each in-app purchase based on the age categories described by § 121.021(b). Developers must provide each app store in which</p> | <p><i>No explicit requirements for the creation of age ratings. It appears that if they are available in the app store from a developer, then they must be used to fulfill parental consent</i></p> | <p>Texas’s law is the most prescriptive, requiring developers to provide an age rating for each app in an app store as well as for each in-app purchase. The law describes information that must be disclosed in</p> |

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| Age Ratings (Cont'd) | <p><i>disclosure requirements.</i></p> <p>Nothing in this chapter may be construed to require a developer or app store provider to create, adopt, or implement an app age rating system or content classification framework. [§ 13-76-404(6)]</p> | <p>an app is available to age ratings assigned to apps and in-app purchases, and the specific content or other elements that led to each rating provided. [§ 121.052]</p> | <p><i>disclosure requirements.</i></p> | <p>those ratings, including the content and other elements that led to each rating.</p> <p>Utah and Louisiana only require that age ratings be provided in a parental consent disclosure if they are already available from a developer in an app store; however, these laws do not expressly mandate developers to disclose age ratings or the content and elements that led to those ratings. Utah goes a step further by expressly affirming that neither a developer or an app store provider are required to create or implement age ratings under this law.</p> |
| Notice of Significant Changes | <p>Must notify app store providers of significant changes to the app [§ 13-75-202(1)(b)]</p> | <p>Must notify covered app store providers of “significant changes” to the app before implementing such changes. [§ 121.053]</p> | <p>Must notify covered app store providers of “significant changes” to the app. [§ 1773(A)(3)]</p> | <p>Texas is the only state requiring developers to provide app stores with notice before a significant change. Texas’s law does not further describe how long before implementing these changes the notice would have to occur. Utah and Louisiana do not prescribe that such notice would need to occur before, potentially permitting developers to provide notice at the time of implementation.</p> |
| Age Category | <p>Developers may only use category data to:</p> <ul style="list-style-type: none"> enforce any developer-created age restrictions; ensure compliance with applicable laws and regulations; and, implement any | <p>Developers may use personal data to:</p> <ul style="list-style-type: none"> enforce any developer-created age-related restrictions; ensure compliance with applicable laws and regulations; and, | <p>When implementing any developer-created safety-related features or defaults, a developer shall use the lowest age category indicated by age verification data provided by an app store provider or age data</p> | <p>Both Utah and Louisiana require developers to use the lowest age category indicated by the available age data about a user to implement age restrictions and safety features. Texas does not.</p> <p>Per amendments adopted in 2026,</p> |

| | Utah SB 142 & HB 498 | Texas SB 2420 | Louisiana HB 570 & HB 977 | Comparison & Analysis |
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| <p>Restrictions</p> <p>Age Category Restrictions (Cont'd)</p> | <p>developer-created safety-related features or defaults [§ 13-75-202(5)]</p> <p>When initially implementing any developer-created, safety-related features or defaults, a developer shall use the lowest age category indicated by:</p> <p>(a) age verification data provided by an app store provider; or</p> <p>(b) age data independently collected by the developer</p> <p>Developers may allow parents to customize age-related restrictions, safety-related features, or content settings for individual users within a minor account after the initial defaults are set. [§ 13-75-202(3)]</p> | <ul style="list-style-type: none"> implement any developer-created safety-related features or defaults. [§ 121.055(a)] <p><i>Note: Does not specify which age category to use when implementing safety-related features.</i></p> | <p>independently collected by the developer. [§ 1773(C)]</p> <p>Note: For purposes of applying default safety settings and access to features within the app, developers of family account apps may use the age range of the primary account holder as the designated age category, and permit the account holder to attest to the age categories of subaccounts. A family account app developer is subject to all other requirements of the law. [§ 1773(E)]</p> | <p>Louisiana includes a narrow carveout for family account apps, allowing developers to rely on the primary account holder’s age category rather than the provided age signal category when implementing safety defaults and feature access.</p> |
| <p>Narrow Parental Consent Exceptions</p> | <p>N/A following 2026 amendments.</p> | <p>The law does not require app stores to obtain parental consent to download apps that:</p> <ul style="list-style-type: none"> Provide direct access to emergency services (i.e., 911, crisis hotlines, or emergency services legally available to minors); Limits data collection to information necessary to provide emergency services; | <p>N/A following 2026 amendments.</p> | <p>All three laws approach carving out very narrow exceptions to parental consent requirements in similar ways. Louisiana’s law makes clear that all of the conditions established in that list must be met for a valid parental consent exception. While moderately less explicit than Louisiana, Texas’s and Utah’s use of “and” (rather than “or”) within the list of conditions would appear to functionally require all the conditions to be met, akin to Louisiana.</p> |

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| Narrow Parental Consent Exceptions (Cont'd) | | <ul style="list-style-type: none"> Provides access without requiring account creation, or collection of unnecessary personal information; and, Is operated by or in partnership with (i) a government entity, (ii) a non-profit organization, or (iii) an authorized emergency service provider. <p>The law does not require app stores to obtain parental consent to download or purchase of an app that is operated by or in partnership with a nonprofit organization that:</p> <ul style="list-style-type: none"> Develops, sponsors, or administers a standardized test used for purposes of admission to or class placement in a postsecondary educational institution or a program within a postsecondary education institution; and, Is subject to subchapter D, chapter 32 in the education code. | | However, while both Utah and Louisiana create an exception for both app stores and developers pursuant to several conditions, Texas only provides the exception for app stores. |
| Other Key Provisions | | | | |
| Prohibitions | Both app store providers and app developers are prohibited from: [§§ 13-75-201(2); -202(4)] | Both app store providers and app developers are prohibited from: [§ 121.056; § 121.026] | Both app store providers and app developers are prohibited from: [§ 1772(B); § 1773(D)] | These prohibitions are generally the same across all three laws. However, Louisiana’s 2026 amendments shifted |

| | <p style="text-align: center;">Utah <u>SB 142 & HB 498</u></p> | <p style="text-align: center;">Texas <u>SB 2420</u></p> | <p style="text-align: center;">Louisiana <u>HB 570 & HB 977</u></p> | <p style="text-align: center;">Comparison & Analysis</p> |
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| <p>on both App Store Providers and Developers</p> | <ul style="list-style-type: none"> Enforcing contracts or terms of service against minors in the absence of parental consent for a minor’s account; Misrepresenting information included in parental disclosures; and, Sharing age category information except between an app store provider and developer or as otherwise required by law. | <ul style="list-style-type: none"> Enforcing contracts or terms of service against minors in the absence of parental consent for a minor’s account Knowingly misrepresent any information in the parental consent disclosure. Sharing “personal data” except between an app store owner and app developer or as otherwise required by law. | <ul style="list-style-type: none"> Enforcing contracts or terms of service against minors in the absence of parental consent for a minor’s account Knowingly misrepresent any information in the parental consent disclosure. Selling age category information. | <p>the prohibition on <i>sharing</i> age category to a ban on <i>sale</i> of age category data.</p> |
| <p>Limitations on Liability</p> | <p>Safe Harbor. Developers are not liable for violations of the age verification and parental consent requirements if they:</p> <ul style="list-style-type: none"> Relied in good faith on age category data and parental consent notifications provided by app stores; and, Complied with the statutory requirements outlined in § 12-75-202. <p>[§ 13-75-402]</p> | <p>An app store is not liable for a violation of the age verification and parental consent requirements if it:</p> <ul style="list-style-type: none"> Uses widely adopted industry standards to verify the age of each user and obtain parental consent; and Applies those standards consistently and in good faith. <p>[§ 121.026]</p> <p>Developers are not liable for violations of the age ratings requirements if they:</p> <ul style="list-style-type: none"> Use widely accepted industry standards applied consistently; and, In good faith to determine age categories and content disclosures. <p>[§ 121.056(b)]</p> | <p>App store providers are not liable if they can demonstrate good faith compliance efforts under these sections. [§ 1774(A)(2)]</p> <p>Developers are not liable under the law if they demonstrate that they’ve complied with the requirements in the developer obligations section. [§ 1774(A)(2)]</p> <p>Developers are not liable for violations of the age category assignments or content description disclosures related to obligations under § 1773(C) if they use widely accepted industry standards and apply those standards consistently and in good faith. [§ 1774(B)]</p> | <p>All three laws provide some form of limitations on liability to developers.</p> <p>Utah is the only law that <i>omits</i> a limitation on liability for app stores related to their age verification and parental consent obligations.</p> |

| | Utah SB 142 & HB 498 | Texas SB 2420 | Louisiana HB 570 & HB 977 | Comparison & Analysis |
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| Limitations on Liability (Cont'd) | | <p>Developers are not liable for violations of the age verification and parental consent requirements if they:</p> <ul style="list-style-type: none"> • Relied in good faith on age category and consent information received from the owner of an app store; and, • Otherwise complied with the requirements for Developers [§ 121.056(c)] | | |
| Enforcement | <p>Private Right of Action: Only a minor or a parent of the harmed minor may bring a civil action against the app store provider or developer for violations under this act. The court will award the parent actual damages or \$1,000 per violation (whichever is greater). [§ 13-75-401]</p> | <p>Violations of the app store and developer requirements (§§ 121.026 and 121.056, respectively) constitute a deceptive trade practice under the Deceptive Trade Practices-Consumer Protection Act (Subchapter E, Chapter 17), and are actionable under that subchapter—which includes a consumer private right of action in addition to state enforcement powers. [§121.101]</p> | <p>Notice & Cure Period: AG must provide written notice of alleged violations at least 45 days before taking enforcement action. If the person remedies the violation within that period, the AG may not proceed with enforcement.</p> <p>Civil Action: AG may file a civil action against anyone who fails to correct a violation after notice or repeats the same violation.</p> <p>Penalties: Each violation by an app store or developer may result in a civil penalty of up to \$10,000 per violation. Violating an administrative or court order may result in a civil penalty of up to \$5,000 per violation [§ 1775]</p> | <p>Following amendments adopted in 2026, Utah’s law relies solely on a new private right of action for violations of the app store and developer requirements in § 13-75-401(2), which can be brought by a minor or a parent of a harmed minor.</p> <p>Texas’s law creates a backdoor PRA by allowing enforcement of violations by app stores or developers under Subchapter E of the Deceptive Trade Practices law, which allows harmed consumers to bring civil suits for violations of the law resulting from misrepresentation along with authorizing state enforcement of deceptive trade practice violations.</p> <p>Louisiana’s law is the sole law to only be enforced through the AG and maintain a cure period.</p> |

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| Effective Dates | <p>All sections except for app store and developer obligations and enforcement provisions: May 6, 2026</p> <p>App store provider and developer requirements: May 6, 2027</p> <p>Enforcement provisions: May 6, 2027</p> | Effective: January 1, 2026 | Effective: July 1, 2027 | <p>Texas's law went into effect first, with only a 6-month turnaround time for compliance. Texas's law also does not include any rulemaking, so there is no mandatory regulatory guidance envisioned before the law takes effect.</p> <p>Utah goes into effect second and has staggered effective dates. The requirements for app store providers and developers as well as the enforcement provisions will take effect in May 2027. All other sections of the Act became effective in May 2026.</p> <p>Louisiana goes into effect last, and it also does not provide for rulemaking.</p> |

**Appendix A:
Developer API Information Provided by App Stores**

| Apple | Google |
|---|---|
| <p>Apple will provide:</p> <ul style="list-style-type: none"> ● A new Declared Age Range API that allows apps to receive age range information for new account users. <ul style="list-style-type: none"> ○ Note: sharing of user information through these signals will be limited solely to the jurisdictions that require app store age signaling. ● All new Apple accounts for users <18 years of age will be required to join a Family Sharing Group and the minor’s parent or guardian will need to provide consent for all App Store downloads, app purchases, and transactions using Apple's In-App Purchase system by the minor. <p>Newer Updates:</p> <ul style="list-style-type: none"> ● November 4 developer news ● Significant Changes API ● Developer framework for age appropriate experiences <ul style="list-style-type: none"> ○ Note: This page is updated on a rolling basis. Check in periodically for up-to-date information. | <p>Google will provide:</p> <ul style="list-style-type: none"> ● A new Play API that allows apps to receive users’ age verification and supervision status, age ranges, and other applicable signals through the Play Age Signals API (beta). <ul style="list-style-type: none"> ○ The Play API page includes information on: <ul style="list-style-type: none"> ■ Using age signals ■ Notifying significant changes ■ Reviewing revoked approvals ■ Testing age signals ○ Note: sharing of user information through these signals will be limited solely to the jurisdictions that require app store age signaling. ● Developers will be able to notify the app store of significant changes through the Play Console without having to publish a new version of the application. The App Store Play Console will also notify developers when parental consent has been revoked for a minor user. ● Developers using this new API will have to comply with Google Play’s requirements concerning how API data must be handled. |
| <p>More details, including additional technical documentation, will be released later this fall.</p> | <p>Current planned dates and next steps:</p> <ul style="list-style-type: none"> ● October 25, 2025: API requirements and a detailed integration guide with example code for the Play API have been published for developers to start working on implementation ● January 1, 2026: Given preliminary injunction of Texas bill, Google disabled return of live responses in the Play Age Signals API (beta) further notice. [This page has not yet been updated to reflect any changes in the prelim injunction status.] ● May 7, 2026: Utah bill goes into effect. ● July 1, 2026: Louisiana bill goes into effect. |