CIPA & COPPA introduction and implementation to a high school

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Abstract—**This paper contains a brief report and summary of CIPA and COPPA, looking at the history of both laws, what each act covers, its compliance, requirements, and recommendations as well as what should be applied by a semi-private high school in order to comply with such laws.**

Keywords—CIPA, COPPA, children's online protection,

I. INTRODUCTION

The internet has brough the 21st century many innovations and revolutionized the ways we live our everyday lives. It has changed the way we communicate, learn, conduct business, govern, and entertain. However, with the many benefits that the internet has brought us, it also comes with its consequences. This includes targeted attacks, lack of privacy, ease to spread harmful and non-ethical content over the internet among many other concerns.

To address some of these matters, CIPA or Children's Internet Protection Act and COPPA (Children's Online Privacy Protection Act) are two laws passed by federal entities that look towards protecting minors from the many harmful content and potential targeted collection of information that is found on the internet nowadays.

This paper will provide an introduction on what these two acts are aimed for, a little bit of their history, what the law covers and what it doesn't, who is should comply to these laws, its requirements, recommendations, and practices, along with its penalties.

The paper will also access and investigate on how CIPA and COPPA should be applied to a high school system, how the school should access and comply to these laws and be aware of the standards that come with it.

II. HISTORY

A. CIPA

In December 15, 2000, Congress passed CIPA - Children's Internet Protection Act to address the concerns about children's access to obscene or hazardous information on the Internet [1]. CIPA imposes specific restrictions on schools or libraries that get discounts for Internet access through the E-rate program, which helps eligible schools and libraries afford certain communications services and goods. The official law was passed after the president signing the bill on December 21st, 2000. The FCC released rules implementing CIPA in early 2001 and updated those rules in 2011 [2].

The law investigates the blocking or filtering most content that is available from the internet that can be harmful in any certain way to children under 13.

B. COPPA

As for the Children's Online Privacy Protection Act (COPPA), it is a law that was proposed in 1998 by the congress. It became effective on April 21, 2000, with the Federal Trade Commission in charge of issuing and enforcing the regulations concerning the children's online privacy [3].

To this day there was only one amendment published by the commission on January 17, 2013, with the same taking effect on July 1, 2013 [3].

The goal of COPPA is to place the parents in control of what information is collected from children (under 13) online. This includes information from general sites, online services, mobile apps, IoT devices, smart toys or anything that is connected to the internet and is targeted to minors under 13 years old [3].

III. REQUIREMENTS - WHAT THE LAW COVERS AND DOES NOT COVER

Both acts are targeted towards the protection children under the age of 13 years old, however, they have quite different purposes. Generally speaking, while one law is targeted towards schools and libraries and the education of one's behavior online and the content that can be accessed, the other law is targeted to the privacy of the children, and the information they share. This is because kids under 13 are considered highly vulnerable when using the internet and being online.

The following paragraphs will go into more detail on what each law covers and what it does not cover.

A. CIPA

The Children's internet protection act looks at the internet safety policies from schools and libraries internet services. The law dictates that all schools and libraries subject to CIPA must include the monitoring of the online activities of minors. This includes the blocking or filtering all internet content (including pictures, videos, or any media) that is obscene, harmful to minors or related to child pornography. The definition of such harmful content will be defined by the local community from the school or library [2].

The law further looks at the internet safety policy and the technology protection measures implemented by the school. These policies must address the following [1]:

- Minors' access to inappropriate content on the internet.

- Minors' safety and security when utilizing e-mail, chat rooms, and other kinds of direct electronic communication.

- Unauthorized access, such as "hacking," and other illegal online activity by children.

- Unauthorized disclosure, use, or dissemination of children' personal information; and

- Measures limiting children' access to potentially dangerous items.

CIPA also looks on the education provided to children on their behavior online. This obligates schools and libraries to educate their students about appropriate online behavior and how to interact with other individuals through social media. This includes raising the cyberbullying awareness and response and teaching how children should have on social networking websites and chat rooms [1].

B. COPPA

COPPA's focus is to protect the privacy of minors in today's online world. It places the parents in control over what information is collected from their young children [3]. It looks to the operators of online websites and services whose main target audience is minors and require them to share or collect any kind of information online. These operators must obey the law by enforcing the following [3]:
- Posting a clear and comprehensive online privacy policy which describes what information is collected online from children and their practices and uses of personal information.
- Providing direct notice to parents and obtaining verifiable parental consent (usually via email), before the collection of any information online.
- Giving the parents the choice of sharing the child's information internally but forbidding the

operator to disclose this information to any third party.
- Give the parents the opportunity to prevent further collection or use of a child's information.
- Provide parents access to their child's information which was shared and having the option to delete such information.
- Maintain the confidentiality, security and integrity of such information that is collected.
- Only retain personal information collected online from a child while it is necessary to fulfill its purpose.
- Not require any more information than necessary for the child to participate in the activity offered by the website.

Any personal information required by such websites includes: first and last name, physical address, online contact information, phone number, SSN, photographs and media, geolocations or information describing or concerning the child or the parents [3].

COPPA however, does not cover any filtering to the internet in order to keep children from accessing inappropriate material. It is also not meant to protect the privacy of teens above the age of 13, or to prevent any minor of lying about their age online [3].

IV. COMPLIANCE, RECCOMENDATIONS & PENALTIES

A. CIPA

CIPA is regulated by the Federal Communications Committee (FCC) and enforced by the Universal Services Angency Company (USAC).

The law is only enforced to schools and libraries that make use of the E-rate program. This program gives eligible schools and libraries access to communications services at a more affordable rate, raging from 20-90% discounts on internet services [4]. For any school to be eligible for this program it must first certify they are in compliance with CIPA and all its requirements listed in section *III A*. The school must first go through a meeting or hearing in order to show they are compliant with CIPA along with all the measures taken and the technologies put in place for the law compliance. After such hearing or meeting, there is no further compliance or additional meetings required only required by the state, local rules or the policy itself [4].

It is also important to note that even though CIPA requires the filtering of certain content from the internet, it does not require the tracking of internet use by minors or adults [1]. The law does not apply to schools that are not taking use of the E-rate program or receive discounts for telecommunications services only. Furthermore, any authorized person can disable the blocking or filtering of the forbidden content for research or other lawful purposes [1].

Also, the authoirities responsible for the CIPA compliance in the school or library level can be anyone from the school board, admnistration or district, a local education agency or the library board and administraiton [4].

B. COPPA

As for COPPA, the requirements can be a bit more complicated as previously listed. However, there is not much active law enformcement for compliance to the law. Today, anyone can spot a COPPA violation to any website or service. This complaint can be reported either their toll free phone number at (877) FTC-HELP or via their website [3].

Penalties for not complying with the law can also be excessive, being up to $46,517, depending on the violations commited [3]. This will be a civil penalty and will depend on the type of personal information collected, how many rules and how many times was the rule violated and how the information was used.

The users responsible for making sure COPPA is being enforced are the websites and services operators and owners [3]. They should be aware of the information they are collecting and from who they are collecting as well as taking the appropriate measures to ensure COPPA is being enforced.

V. A HIGH SCHOOL SCENARIO

Both COPPA and CIPA measures should be taken into place by a school admnistration in order to comply with all the rules. CIPA however is the most important law and the one which should be taken the most into consideration by a high school, since a high school genreally does not have minors under 13 as their target audience.

The CIPA measures taken in place by a high school should first be the filtering of inappropriate content for children. This should include tools such as a firewall or a web gateway that manages the content the students see, filtering out the forbidden content and only allowing them to access appropriate content and educational pages.

Schools should also have educational classes periodically in order to teach students on how to use the internet appropriately. This includes the content they should be looking at the internet, the dangers that the internet can contain, how to behave appropriatelly on websites, chat rooms and social media and also raise the awareness and consequences of cyber bullying in today's online world.

As for COPPA, the school IT department should be aware of any information they require from children to share and make sure any critical information required by children has their parent's consent before being shared. This can include a signature from their parents or an electronic authorization.

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