



PUTTING KIDS
BEFORE BIG
TECH PROFITS

App Store Accountability Act

THE BILL:

- 1** Protects minors by requiring parental permission before they can agree to apps' terms of service contracts.
- 2** Requires accurate app age ratings to ensure parents can give informed consent.
- 3** Requires app stores to verify age using available data and technology.
- 4** Focuses on contract law, not content moderation or free speech.

SAFE KIDS,
EMPOWERED PARENTS,
AND A BRIGHTER
DIGITAL FUTURE.



App Store Accountability Act

APP STORES ARE THE BROKERS OF
DIGITAL HARM AND EXPLOITATION



App stores are the digital gatekeepers of children's online lives, but they systematically harm them by treating them as adults and allowing them to consent to exploitative contracts with large corporations. App stores face little accountability for misleading age ratings, and they routinely make critical details, such as app content descriptions, hard to access. This makes informed consent effectively impossible.

Unlike nearly every other industry that markets products to children and teens, app stores have been practically exempt from child safety regulations. This creates dangerous loopholes in protections for minors, leaving them vulnerable to harm, abuse, and exploitation.

The App Store Accountability Act (ASAA) addresses several critical gaps in app store protections for children.

1. Parental Consent for Users Under 18

If individuals must be 18 to independently enter into binding contracts, the same standard should apply to the terms of service of app stores. By facilitating these agreements, app stores broker minors into contracts that they cannot legally consent to, exposing them to financial, personal safety, and legal risks. The ASAA closes this loophole by requiring app stores to obtain verifiable parental consent before minors can download apps or make in-app purchases.

2. App Store “Truth in Advertising”

App age ratings are often misleading, inconsistent, and unaccountable. The ASAA requires clear, accurate app descriptions and allows parents to take legal action if an app store or developer knowingly misrepresents the risks, ensuring that they are held responsible for deceptive ratings.

3. App Store Age Verification

App stores allow developers to unknowingly enter contracts with minors, creating legal, ethical, and safety risks, exposing children to unenforceable agreements and predatory situations. The App Store Accountability Act fixes this by requiring age verification and anonymized age categories for developers, ensuring compliance with privacy laws and stronger child protections.

Because app stores already collect birthdates, most adults link a credit card, and parents verify their children's ages, implementing age verification is both simple and technically feasible.

96%
SUPPORT

**Passed in
Utah Senate**

95%
SUPPORT

**Passed in
Utah House**

This legislation is supported by:



For inquiries contact us at info@digitalchildhoodalliance.org or visit: DigitalChildhoodAlliance.org

App Store Accountability Act

FREQUENTLY ASKED QUESTIONS



1. What are the key components of the App Store Accountability Act?

The App Store Accountability Act (ASAA) introduces key measures to protect children and restore parental authority in digital spaces:

App Store Age Verification: App stores must securely share verified age categories with apps, enabling developers to comply with laws like COPPA and provide in-app experiences consistent with their stated age ratings, enhancing safety and simplifying compliance.

Accurate and Transparent Age Ratings: App age ratings must reflect actual content and in-app experiences, addressing the widespread concerns that apps misrepresent their suitability for children by downplaying mature content or features. It empowers parents to take legal action against misrepresented ratings and ensures accountability, transparency, and safer experiences for kids.

Mandatory Parental Consent: App stores must obtain verifiable parental consent before minors can download apps or make in-app purchases, protecting children from privacy risks, financial harm, and unenforceable contracts.

By closing loopholes and holding app stores accountable, the ASAA ensures platforms meet legal obligations, safeguard children's rights, and create a safer digital space for families.

2. Why is the App Store Accountability Act Needed?

The App Store Accountability Act (ASAA) protects children online and restores parental control over digital spaces. Under contract law, minors cannot legally enter binding agreements without parental consent. Yet, app stores routinely allow known minors to download apps, accept terms of service, and make in-app purchases—often without any parental supervision. This loophole exposes children to privacy risks, financial harm, and dangerous digital environments, while app stores profit from a system that prioritizes revenue over families' rights.

[Recent investigations](#) have exposed widespread misrating of apps as safe for children. Misleading age ratings, such as "12+," give parents a false sense of security, leading them to trust apps that fail to protect their children. Some apps offer COPPA-compliant privacy protections and safer default settings for younger users, but these safeguards are often removed when children falsely claim to be older, leaving them exposed to significant privacy and safety risks.

When app stores fail to share a user's verified age with apps, they actively mislead parents by advertising a child-safer experience while allowing apps to deliver variable and often inappropriate experiences once downloaded. This deliberate oversight frequently violates child protection laws, including COPPA, as app stores knowingly permit underage children to download restricted apps like social media. Inaccurate age ratings also render parental controls ineffective, as they depend on accurate and reliable age ratings to function properly.

App stores have already demonstrated their ability to securely and privately share age data through tools like "Verify for Wallet." This shows that practical, effective solutions to protect children are not only feasible but well within reach.

3. How can we hold app stores accountable for protecting kids without complicating user experience?

The App Store Accountability Act (ASAA) provides an efficient and minimally disruptive framework for age verification and parental consent. By using app stores as centralized hubs, the ASAA could potentially leverage existing systems, such as Apple's Family Sharing and Google's Family Link, which already collect age and parental relationship data. This integration ensures compliance without creating additional burdens for users.

The ASAA has garnered support from leading child safety organizations, including the National Center on Sexual Exploitation and the Institute for Family Studies, as well as major tech companies like Meta. Renowned researcher Jonathan Haidt [endorsed device-level age verification](#) in *The Anxious Generation* as a critical step in creating safer online spaces for children.

[Recent legal precedents](#) support holding platforms liable for knowingly enabling harmful activities. The ASAA builds on this by requiring app stores to ensure compliance with child protection laws like COPPA and to address misleading age ratings. These measures strengthen parental controls, empower parents to make informed decisions, and help protect children. By adhering to established legal principles and minimizing user disruption, the ASAA balances operational practicality with the pressing need to safeguard children in digital spaces.

4. Does this bill restrict free speech?

No, this bill focuses on ensuring legal compliance and enforcing parental consent for minors entering contracts, specifically in app distribution, not speech. It aligns with existing regulations requiring parental consent for minors to agree to Terms of Service (TOS). It ensures age verification to obtain proper parental approval before minors enter binding agreements.

The bill also requires app stores to provide anonymized age data, helping developers comply with child protection laws like COPPA and ensuring minors do not enter unenforceable contracts. Additionally, the bill mandates accurate age ratings, addressing misleading or overly broad ratings that confuse parents and undermine the effectiveness of parental controls. By requiring accurate ratings, the bill empowers parents to make informed decisions and strengthens app store accountability.

App stores like Apple and Google already collect age data and have the ability to share it securely. Their failure to do so undermines child protection efforts. Rather than restricting speech, this bill ensures app stores meet their legal obligations to protect children and enforce parental consent.

5. How could app stores verify users' ages?

App stores could verify adult users by requiring them to link a credit card to their digital wallet, a feature already widely accessible and commonly used by nearly all app store users. This method is seamless and practical, as most adults already rely on credit cards for app and in-app purchases. Alternatively, app stores could adopt any of the numerous commercially available age verification systems to ensure compliance.

For children, app stores could require accounts for users under 18 to link to a verified adult supervisory account. During account setup, users already input their date of birth, and a parent or guardian could affirm this information to establish oversight.

To improve accuracy, app stores could leverage data already collected under existing privacy policies, such as device usage patterns or purchase history, to validate users' age information. By utilizing data that is typically already available, app stores can establish a secure, practical, and user-friendly framework for age verification, enhancing trust and privacy while prioritizing user safety.

Restores Parental Authority

Under long-standing contract law, minors cannot legally enter binding agreements without parental approval. The bill ensures that app stores verify parental consent before minors can download apps, agree to terms of service, or make in-app purchases.

Closes Dangerous Loopholes

App stores currently allow minors to bypass safeguards and enter agreements without parental consent. This exposes children to inappropriate content, privacy risks, and financial harm while platforms profit from invalid contracts.

App Stores Already Have the Tools

App stores like Apple and Google have already collected age and parental relationship data and use privacy-preserving tools, such as “Verify with Wallet.” The bill requires them to use these capabilities to protect children.

Requires App Stores to Share Anonymized Age Data

Many apps offer a range of in-app experiences based on user age. The bill requires app stores to securely share anonymized age data with developers so they can provide age-appropriate content and comply with child protection and privacy laws.

Creates Accountability for Misleading Age Ratings

The bill empowers parents to hold app stores and developers accountable when apps misrepresent age ratings or content. Creating penalties for misrepresentations incentivizes accurate ratings and safer app experiences for kids.

Streamlines Compliance for Developers

Small developers are not overly burdened. The bill places the responsibility for age verification on app stores, ensuring developers receive the information they need to comply without building complex new systems.

Balances Safety and Privacy

The bill protects user privacy while enabling stronger safeguards for children by sharing only anonymized age data. This approach builds on existing infrastructure without introducing unnecessary risks.

Targets App Stores, Not Free Speech

The bill addresses app distribution practices, not content regulation. It ensures platforms comply with legal obligations, like verifying parental consent, without restricting free speech.



Nearly 90% of teens use an iPhone, yet Apple treats child safety as an afterthought. The company that sets the standard for innovation refuses to apply the same functional elegance to its protections for kids, burying ineffective tools under layers of menus while profiting from children’s easy access to predatory apps. Apple and Google have the power to lead on child safety but choose inaction, leaving children unprotected in a digital world designed to exploit them.

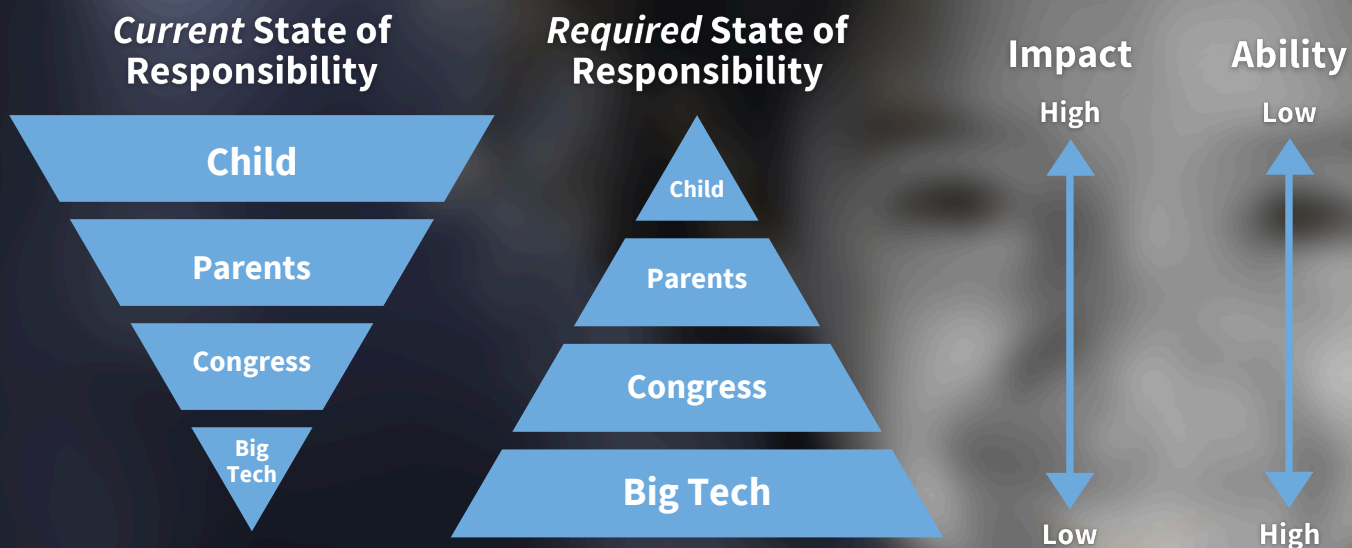
Melissa McKay, Digital Childhood Alliance



For years, app stores have turned a blind eye to child safety, allowing kids to download apps, enter into exploitative contracts they don’t understand, and share personal data—all without parental consent. Lawmakers now have a clear path forward, backed by a coalition of experts who agree: The App Store Accountability Act is vital to creating a safer online environment for American youth.

Dawn Hawkins, National Center on Sexual Exploitation

The Child Online Exploitation Impact/Ability Imbalance



The App Store Accountability Act closes critical gaps in child safety by requiring app store-level age verification, accurate content ratings, and parental consent for downloads by minors.

Apple's & Google's Faux "Safety Solutions"

TOO LITTLE, TOO LATE.
NO REAL ACCOUNTABILITY



On February 28, Apple announced new child safety features, seemingly to counter movement in over a dozen states to pass the App Store Accountability Act (ASAA).

Don't be fooled. Apple's new update offers half-measures with no real accountability.

Under Apple's proposed "Safety Solution"

- ❌ **Parental consent is NOT** required for kids to enter into complex contracts.
- ❌ **App store supervision is NOT** required after age 12.
- ❌ **App age ratings** are still self-assigned **WITHOUT** real accountability.
- ❌ **Developers have NO WAY** to verify that parental consent has been obtained.

Apple's announcement of a new "Age Assurance" API proves that **Apple has the technical ability to age-verify App Store users and obtain parental consent** while also adhering to strict privacy rules.

Google

On March 12, Google's Kareem Ghanem published a blog post advocating for a weak alternative to the ASAA while misrepresenting key facts.

Myth: Google already has 'strong' safeguards for youth.

Fact: Google also allows children 13yr+ to remove parental supervision without parental approval.

Myth: There are "privacy concerns" with Google sharing anonymous age category data with developers.

Fact: Developers in Google's app store are already allowed to collect and monetize children's exact location, search history, contacts, purchases, and other sensitive identifiers without parental consent.

Myth: ASAA is overreaching. The "weather app" doesn't need to know if a user is a child or parental consent.

Fact: The weather app collects a user's exact location and many other personal identifiers and requires a terms of service agreement like every other app.

Google's so-called youth "safety solution" (modeled after Apple's) **offers none of the meaningful protections in the App Store Accountability Act.** Instead, it simply reinforces the status quo..

Perspective: App stores are exploiting our children. We must change that

APP STORES ARE THE DIGITAL GATEKEEPERS OF OUR CHILDREN'S LIVES, AND YET THEY ROUTINELY TREAT KIDS LIKE ADULTS

By Dawn Hawkins, Todd Weiler, Melissa McKay, Michael Toscano

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Imagine a bank where children as young as 13 are allowed to sign contracts for car loans, high-limit credit cards, or even connect with risky foreign investors. This same bank hides the fine print, misleads young customers and profits by exploiting their personal data — including selling it to international adversaries. If parents step in, the bank assures them there's nothing to worry about, even when that's far from the truth. When problems inevitably arise, the bank blames parents for not doing enough.

This scenario sounds outrageous because we all know children lack the capacity to make such binding decisions. Yet, in the digital world, something like this happens millions of times every day. App stores, the digital gatekeepers of our children's lives, routinely treat kids like adults, steering them into accepting exploitative terms of service with billion-dollar corporations. These agreements have the potential to give apps sweeping access to personal data — photos, contact lists, exact locations, even microphones and cameras — all without meaningful consent or oversight.

The problem doesn't end there. App stores also currently face little accountability for their misleading age ratings. A recent Wall Street Journal investigation exposed how Apple's faulty app ratings deceive parents by failing to reflect the risks and content within apps. Apps featuring violent, sexual or exploitative material are routinely labeled as suitable for ages 4+ or 12+. A detailed Canadian Center for Child Protection report eviscerated both Apple and Google for their flawed app age rating systems and inadequate child safety practices. Parental controls rely on accurate age ratings to function effectively; without them, the promise of safeguarding children becomes an illusion.

Roblox, a popular gaming platform, for instance, is rated as safe for ages 12+ in the Apple App Store, with its primary risk listed as "cartoon violence." The platform has faced severe criticism for failing to protect young users, however, with thousands of reports of child exploitation. A Hindenburg Research investigation labeled Roblox an "X-rated pedophile hellscape," exposing widespread safety flaws. Millions of families trust app store ratings, unaware of these dangers. In one tragic case, a Utah boy was allegedly groomed on Roblox, kidnapped by a predator, and taken across state lines.

As if this weren't bad enough, app stores bury critical details, such as content descriptors, app privacy policies and security practices. Parents must scroll past extensive app advertisements or click a separate link to see them. These details aren't readily visible on the initial screen where parents are asked to approve or decline an app for their child, depriving them of the ability to make informed decisions for their children.

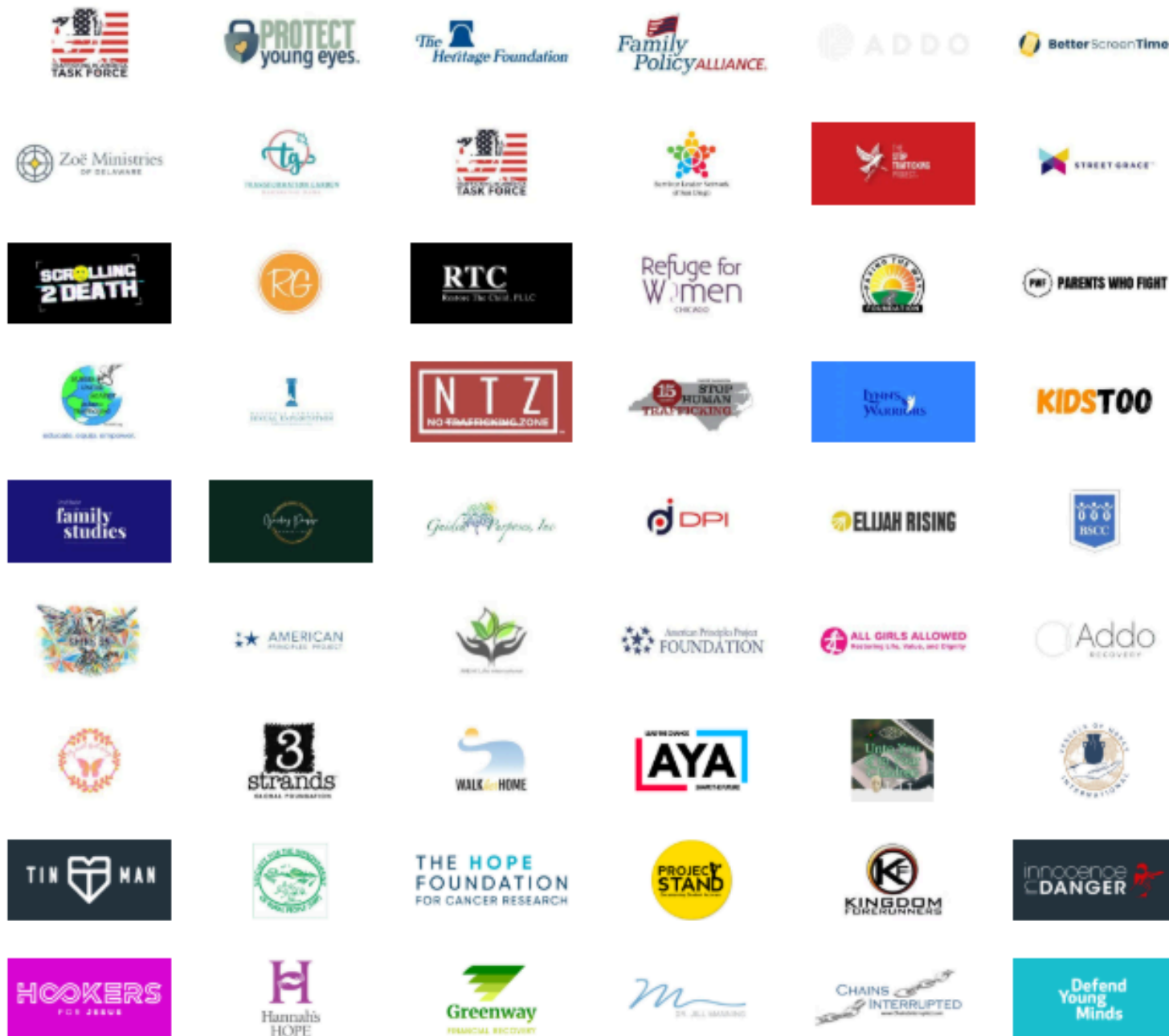
Yet, Apple continues to tout its app store as "a trusted place where users can safely discover and download apps." During the Epic Games vs. Apple trial, Apple attorneys argued that its app store's safety measures were as robust as a "six-point racing harness." These claims starkly contradict growing evidence that Apple and other app stores routinely mislead parents and exploit children. Parents and policymakers must demand accountability from these digital gatekeepers to ensure that the protections we afford children in the physical world extend to the digital one.

Related

The App Store Accountability Act offers a critical and timely solution to protect children in Utah. By restoring parental oversight, increasing transparency and enforcing accountability, it directly addresses the systemic failures of today's app store practices. The act requires app stores to verify parental consent before minors can download apps, agree to terms of service or make purchases — ensuring that parents, not tech platforms, have the final say in their children's digital lives. The act empowers parents with a private right of action, enabling them to hold app stores accountable when app ratings or descriptions misrepresent content. This provision creates a powerful incentive for companies to provide accurate ratings and disclose all risks clearly and accurately.

Additionally, the act requires app stores to securely verify ages and share them with apps as anonymous age categories. This method safeguards user privacy while enabling developers to comply with federal laws and engage appropriate safety defaults so that children enjoy the secure digital experience advertised in the app store.

The App Store Accountability Act brings us closer to a future where digital gatekeepers are held to the same standards as any responsible brick-and-mortar institution. Utah can lead the way by standing up for its children and parents and sending a clear message to Big Tech: No more exploitation. No more excuses. It's time to put kids first.



We are an alliance fighting for policies that prioritize parent empowerment and children's online well-being, because every child deserves a thriving and safe childhood.

App stores have gone unregulated for too long, prioritizing profit over protection and leaving children vulnerable.

We're uniting parents, advocates, and organizations to demand accountability. Together, we can ensure app stores put families first and give parents the tools to safeguard their children for a healthier, safer digital future.



Join over 60 child advocacy groups nationwide
supporting the **App Store Accountability Act**.

DigitalChildhoodAlliance.org

