

December 11, 2025

The Honorable Gus Bilirakis
United State House of Representatives
Washington, DC 20510

The Honorable Jan Schakowsky
United State House of Representatives
Washington, DC 20510

The Honorable Brett Guthrie
United State House of Representatives
Washington, DC 20510

The Honorable Frank Pallone
United State House of Representatives
Washington, DC 20510

Re: House Package of 18 Bills to Protect Children and Teens Online

Dear Representative Bilirakis, Representative Schakowsky, Representative Guthrie, Representative Pallone, and Members of the Subcommittee on Commerce, Manufacturing, and Trade:

The undersigned education and parent associations write today to provide feedback on the [package of 18 bills](#) to protect children and teens online that was [introduced](#) on November 25, 2025. We appreciate your continued leadership on the important work of increasing online privacy and data security protections for our nation's children and teens, and we look forward to continuing to work with you as the package progresses.

Our organizations prioritize the privacy and safety of student data, and we strongly support updates and revisions to child privacy protections. Minors are uniquely vulnerable to harms online and deserve heightened protections to keep them safe. While we commend the Committee's goals to pass legislation modernizing protections for children online, we are deeply concerned that the package may unintentionally limit schools' ability to effectively establish privacy-protective safeguards for education technology (edtech).

We are particularly concerned that the broad preemption language added to the [Children and Teens' Online Privacy Protection Act](#) (COPPA 2.0) will invalidate state laws regulating edtech vendors who receive student data when providing services for schools, such as California's [Student Online Personal Information Protection Act](#) (SOPIPA) and similar laws passed in twenty-three other states. SOPIPA-style laws establish comprehensive requirements for edtech vendors that supplement the responsibilities of educational agencies or institutions under the Family Educational Rights and Privacy Act (FERPA). These protections are critical to ensuring student privacy is safeguarded when it is shared externally with third party technology companies.

The [Kids Online Safety Act](#) (KOSA) also has similarly broad preemption language. We are concerned that this language would significantly limit state child privacy laws that benefit students. These state laws are crucial to ensuring that young people retain strong online privacy protections.

We are also concerned that several of these bills may have unintended consequences for schools utilizing collaborative and gamified edtech platforms to personalize and enhance learning. For example:

- The [Algorithmic Choice and Transparency Act](#) requires online platforms to give users an option to easily switch between personalized recommendation systems and input-transparent algorithms, potentially requiring edtech providers to offer students non-adaptive versions of adaptive learning products. The bill should not allow students to unilaterally decide to circumvent using an adaptive learning product that their school has carefully vetted for privacy and security safeguards and contracted to use to improve learning.
- The [Safer Guarding of Adolescents from Malicious Interactions on Network Games \(GAMING\) Act](#) requires online video game providers to limit minors' ability to communicate with other users (including adults) by default, and says that parents are the only one who can disable the safeguards. This may unintentionally restrict students' ability to communicate with teachers and their classmates on gamified edtech platforms used in class.

Thank you for considering our views and it is our hope that we can address these issues of great importance to education stakeholders. We look forward to continuing to work with you to fine-tune the provisions in these bills to ensure that enhanced privacy protections for children online do not have unintended consequences for our nation's schools.

Sincerely,

AASA, The School Superintendents Association
Association of Educational Service Agencies
Association of School Business Officials International (ASBO)
Council of the Great City Schools
National Association for Pupil Transportation
National Association of Elementary School Principals
National Association of Secondary School Principals
Public Interest Privacy Center