

# Challenge.gov Includes Multiple Protections Young Users

Challenge.gov is not aimed explicitly or primarily at children, but is proud to feature a number of agency challenges and contests meant for kids. These contests can foster creativity, get everyone involved in learning and discovery, and produce solutions that contribute to education at all ages. At the same time, it is vital to ensure that young users have a fun and safe experience with challenges hosted on Challenge.gov.

Challenge.gov's strategy for protecting users begins with the [Children's Online Privacy Protection Act of 1998](#), or COPPA. COPPA applies to any website or online service directed to children that collects personal information from children under the age of 13; or that has actual knowledge that it is collecting personal information from a child.

Challenge.gov, as constructed, meets neither of these criteria. Challenge.gov's registration process actively screens out children under age 13, thus ensuring that no information is collected from them. It does so without ever collecting specific personal information regarding a registrant's age. Agencies can still use Challenge.gov to host challenges for kids, if they choose to do so.

## How Can Kids Participate in Challenges on Challenge.gov?

Agencies using Challenge.gov may create challenges that allow children under 13 to create entries that can then be submitted online by a parent or guardian. These challenges often encourage children under 13 to undertake some offline activity—for example, creating a poster or writing an original essay. Registration with Challenge.gov is not required to access all materials necessary to create an eligible submission for such challenges (e.g., to view the rules of the challenge), and the ability to participate in challenges is separate from the activity of actually using the site.

The spirit of COPPA requires that a child's participation in a game, prize or other activity cannot be conditioned on their revealing more personal information than needed to participate; Challenge.gov satisfies this by ensuring that any child with a consenting parent or guardian can enter, and potentially win, any contests hosted on Challenge.gov for which children under 13 are eligible. The parent or guardian would be responsible for submitting the entry online and accepting the prize on behalf of the child. This type of strategy has been used successfully by private companies such as Jif Peanut Butter (<http://bit.ly/ctPq0E>) and Harris Teeter (<http://bit.ly/9tzNBx>) to run contests aimed at children under age 13. All users under the age of 18 may have to provide a parental consent form along with their submission in order to be eligible for challenges open to those under 18. Challenge.gov provides a generic consent form that all agencies may use, at [http://www.challenge.gov/parental\\_consent\\_form.pdf](http://www.challenge.gov/parental_consent_form.pdf).

## Safeguards in Place for Young Users

In addition to mechanisms that prevent users under age 13 from personally creating an account, Challenge.gov features several safeguards that enable agencies to catch minor users and pull them to "safe territory" if needed. All solution submissions require pre-moderation, or review by an agency moderator, before being posted. Blog comments can also be pre-moderated if desired. In the event that a solution submission, or accompanying profile image, raises suspicion that a minor may be using the site, Challenge.gov enables administrators to contact users via e-mail through an anonymized form. If a minor user is discovered operating an account on Challenge.gov, their user account will be deleted immediately in accordance with the site's global Privacy Policy.

## FACTS AT A GLANCE

- Challenge.gov does not meet the criteria for application of the Children's Online Privacy Protection Act of 1998. However, it fulfills many of the law's requirements in spirit.
- The COPPA and Young User strategy employed by Challenge.gov has been used by major private companies to launch contests aimed at children under age 13.
- Challenge.gov enables users under age 13 to learn about, enter, and win challenges, but a consenting parent/guardian must operate a user account on their behalf.
- Challenge.gov provides a generic consent form that all agencies can use to obtain parental consent for a minor to enter a challenge or contest.
- Safeguards such as pre-moderation, an anonymized contact form, and a clear Privacy Policy enable all agencies to create challenges that present kids with a fun, safe environment.
- Each challenge is unique. Agencies should consult their general counsel during the planning stages of a challenge.

**Additional questions? E-mail us!**  
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