

**NIST IR 8477-Based Set Theory Relationship Mapping (STRM)**

**Reference document:** Secure Controls Framework (SCF) version 2026.1  
**STRM Guidance:** <https://securecontrolsframework.com/start-here/set-theory-relationship-mapping-strm/>

**Focal Document:**

**Focal Document URL:** <https://www.govinfo.gov/content/pkg/USCODE-2024-title15/pdf/USCODE-2024-title15-chap91-sec6502.pdf>  
**Published STRM URL:** <https://content.securecontrolsframework.com/strm/scf-strm-usa-federal-law-coppa-2024.pdf>

**Children's Online Privacy Protection Act (COPPA) (2024)**

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
Sec. 6502.	Regulation of unfair and deceptive acts and practices in connection with collection and use of personal information from and about children on the Internet	N/A	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(a)	N/A	Acts prohibited	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(a)(1)	N/A	In general It is unlawful for an operator of a website or online service directed to children, or any operator that has actual knowledge that it is collecting personal information from a child, to collect personal information from a child in a manner that violates the regulations prescribed under subsection (b) of this section.	Functional	Intersects With	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	8	
Sec. 6502.(a)(1)	N/A	In general It is unlawful for an operator of a website or online service directed to children, or any operator that has actual knowledge that it is collecting personal information from a child, to collect personal information from a child in a manner that violates the regulations prescribed under subsection (b) of this section.	Functional	Intersects With	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to minimize the collection of Personal Data (PD) to only what is adequate, relevant and limited to the purposes identified in the data privacy notice, including protections against collecting PD from minors without appropriate parental or legal guardian consent.	8	
Sec. 6502.(a)(2)	N/A	Disclosure to parent protected notwithstanding paragraph (1), neither an operator of such a website or online service nor the operator's agent shall be held to be liable under any Federal or State law for any disclosure made in good faith and following reasonable procedures in responding to a request for disclosure of personal information under subsection (b)(1)(B)(iii) of this section to the parent of a child.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)	N/A	Regulations	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(1)	N/A	In general Not later than 1 year after October 21, 1998, the Commission shall promulgate under section 553 of title 5 regulations that -	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(1)(A)	N/A	require the operator of any website or online service directed to children that collects personal information from children or the operator of a website or online service that has actual knowledge that it is collecting personal information from a child -	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(1)(A)(i)	N/A	to provide notice on the website of what information is collected from children by the operator, how the operator uses such information, and the operator's disclosure practices for such information; and	Functional	Subset Of	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	10	
Sec. 6502.(b)(1)(A)(ii)	N/A	to obtain verifiable parental consent for the collection, use, or disclosure of personal information from children;	Functional	Intersects With	Parent or Guardian Opt-In Consent For Minors	PRI-03.13	Mechanisms exist to obtain parental or guardian consent for Personal Data (PD) processing actions through reasonable consumer expectations, when the data subject is a minor.	5	
Sec. 6502.(b)(1)(B)	N/A	require the operator to provide, upon request of a parent under this subparagraph whose child has provided personal information to that website or online service, upon proper identification of that parent, to such parent -	Functional	Intersects With	Authorized Agent	PRI-03.6	Mechanisms exist to allow data subjects to authorize another person or entity (e.g., authorized agent, proxy, etc.), acting on the data subject's behalf, to make Personal Data (PD) processing decisions.	5	
Sec. 6502.(b)(1)(B)	N/A	require the operator to provide, upon request of a parent under this subparagraph whose child has provided personal information to that website or online service, upon proper identification of that parent, to such parent -	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
Sec. 6502.(b)(1)(B)(i)	N/A	a description of the specific types of personal information collected from the child by that operator;	Functional	Intersects With	Personal Data (PD) Categories	PRI-05.7	Mechanisms exist to define and implement data handling and protection requirements for specific categories of sensitive Personal Data (PD).	5	
Sec. 6502.(b)(1)(B)(ii)	N/A	the opportunity at any time to refuse to permit the operator's further use or maintenance in retrievable form, or future online collection, of personal information from that child; and	Functional	Intersects With	Revoke Consent	PRI-03.4	Mechanisms exist to allow data subjects to revoke consent to collect, receive, process, store, transmit, share and/or update their Personal Data (PD).	8	
Sec. 6502.(b)(1)(B)(iii)	N/A	the opportunity at any time to refuse to permit the operator's further use or maintenance in retrievable form, or future online collection, of personal information from that child; and	Functional	Intersects With	Authorized Agent	PRI-03.6	Mechanisms exist to allow data subjects to authorize another person or entity (e.g., authorized agent, proxy, etc.), acting on the data subject's behalf, to make Personal Data (PD) processing decisions.	5	
Sec. 6502.(b)(1)(B)(iii)	N/A	notwithstanding any other provision of law, a means that is reasonable under the circumstances for the parent to obtain any personal information collected from that child;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
Sec. 6502.(b)(1)(C)	N/A	prohibit conditioning a child's participation in a game, the offering of a prize, or another activity on the child disclosing more personal information than is reasonably necessary to participate in such activity; and	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(1)(D)	N/A	require the operator of such a website or online service to establish and maintain reasonable procedures to protect the confidentiality, security, and integrity of personal information collected from children.	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	8	
Sec. 6502.(b)(1)(D)	N/A	require the operator of such a website or online service to establish and maintain reasonable procedures to protect the confidentiality, security, and integrity of personal information collected from children.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
Sec. 6502.(b)(2)	N/A	When consent not required the regulations shall provide that verifiable parental consent under paragraph (1)(A)(ii) is not required in the case of -	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(A)	N/A	online contact information collected from a child that is used only to respond directly on a one-time basis to a specific request from the child and is not used to recontact the child and is not maintained in retrievable form by the operator;	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(B)	N/A	a request for the name or online contact information of a parent or child that is used for the sole purpose of obtaining parental consent or providing notice under this section and where such information is not maintained in retrievable form by the operator if parental consent is not obtained after a reasonable time;	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(C)	N/A	online contact information collected from a child that is used only to respond more than once directly to a specific request from the child and is not used to recontact the child beyond the scope of that request -	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(C)(i)	N/A	if, before any additional response after the initial response to the child, the operator uses reasonable efforts to provide a parent notice of the online contact information collected from the child, the purposes for which it is to be used, and an opportunity for the parent to request that the operator make no further use of the information and that it not be maintained in retrievable form; or	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(C)(ii)	N/A	without notice to the parent in such circumstances as the Commission may determine are appropriate, taking into consideration the benefits to the child of access to information and services, and risks to the security and privacy of the child, in regulations promulgated under this subsection;	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(D)	N/A	the name of the child and online contact information (to the extent reasonably necessary to protect the safety of a child participant on the site) -	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(D)(i)	N/A	used only for the purpose of protecting such safety;	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(D)(ii)	N/A	not used to recontact the child or for any other purpose; and	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(D)(iii)	N/A	not disclosed on the site, if the operator uses reasonable efforts to provide a parent notice of the name and online contact information collected from the child, the purposes for which it is to be used, and an opportunity for the parent to request that the operator make no further use of the information and that it not be maintained in retrievable form; or	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(E)	N/A	the collection, use, or dissemination of such information by the operator of such a website or online service necessary -	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(E)(i)	N/A	to protect the security or integrity of its website;	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(E)(ii)	N/A	to take precautions against liability;	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(E)(iii)	N/A	to respond to judicial process; or	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
Sec. 6502.(b)(2)(E)(iv)	N/A	to the extent permitted under other provisions of law, to provide information to law enforcement agencies or for an investigation on a matter related to public safety.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control

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Sec. 6502.(b)(3)	N/A	Termination of service The regulations shall permit the operator of a website or an online service to terminate service provided to a child whose parent has refused, under the regulations prescribed under paragraph (1)(B)(ii), to permit the operator's further use or maintenance in retrievable form, or future online collection, of personal information from that child.	Functional	No Relationship	N/A	N/A		0	No applicable SCF control
Sec. 6502.(c)	N/A	Enforcement Subject to sections 6503 and 6505 of this title, a violation of a regulation prescribed under subsection (a) of this section shall be treated as a violation of a rule defining an unfair or deceptive act or practice prescribed under section 571(a)(1)(B) of this title.	Functional	No Relationship	N/A	N/A		0	No applicable SCF control
Sec. 6502.(d)	N/A	Inconsistent State law No State or local government may impose any liability for commercial activities or actions by operators in interstate or foreign commerce in connection with an activity or action described in this chapter that is inconsistent with the treatment of those activities or actions under this section.	Functional	No Relationship	N/A	N/A		0	No applicable SCF control