

# COPPA Amendments Open the Door to More State Privacy Claims

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Shelby Dolen, an associate in Troutman Pepper Locke's Privacy + Cyber Practice Group, was quoted in the April 24, 2026 *Privacy Daily* article, "[COPPA Amendments Open the Door to More State Privacy Claims](#)."

A federal court granting Michigan COPPA standing is an intriguing development for other state enforcers, given this week's rule update, said Troutman privacy attorney Shelby Dolen. "COPPA has more teeth now and has more requirements, so maybe we'll see more enforcement." The overlap between COPPA and state law requirements often comes up in conversations about compliance strategy, she added. "If you are a company in the COPPA space, [the new amendments are] to be taken seriously, especially with the risk of state AG enforcement."

Separate consent is a "pretty dramatic" shift, said Dolen. Previously, companies could "bundle" consent for collection, use and disclosure. Now a parent can consent to collection but deny disclosure, meaning companies must create separate consent mechanisms, she said. In compliance conversations, states — not the FTC — are considered the biggest enforcement risk, she said.

The changes mean it's important for COPPA-compliant companies to update privacy notices, particularly when listing third parties like cookie providers, analytics companies and marketing teams, said Dolen. External elements like privacy notices are what draw an enforcer's attention, which in turn leads to scrutiny of internal processes, she said: So it's important to examine privacy notices and consent procedures.

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