

1 STATE OF OKLAHOMA

2 2nd Session of the 60th Legislature (2026)

3 SUBCOMMITTEE RECOMMENDATION
4 FOR

5 HOUSE BILL NO. 4110

6 By: Ford

7 SUBCOMMITTEE RECOMMENDATION

8 An Act relating to state government; creating the
9 Transparency and Accountability Platform (TAP) Act;
10 providing definitions; establishing TAP platform to
11 support a Supplemental Nutrition Assistance Program
12 (SNAP) Integrity Overlay and a Corrections
13 Transparency Overlay; authorizing the Department of
14 Human Services (Department) and Department of
15 Corrections (DOC) to procure and deploy the TAP
16 platform in coordination with the Office of
17 Management and Enterprise Services; clarifying the
18 TAP platform shall be a thin overlay and not require
19 replacement of core eligibility, supervision, or
20 payment systems; identifying purposes for which the
21 Department shall implement the TAP platform;
22 directing the Department to implement an initial
23 pilot program; authorizing the Department to expand
24 the SNAP Integrity Overlay statewide after completion
and review of pilot program; clarifying participation
in TAP-enabled processes shall be consistent with
federal SNAP eligibility; identifying the purposes
for which DOC shall implement the TAP platform;
directing DOC to implement an initial pilot program;
authorizing Department to expand the Corrections
Transparency Overlay statewide after completion and
review of pilot program; directing biometric
identifiers and templates to remain on participant's
or supervised individual's device; clarifying the TAP
platform may receive only nonbiometric cryptographic
assertions; allowing the Department and DOC to
receive and maintain nonbiometric data; limiting uses
and retention of collected data; directing the
Department and DOC to provide clear, plain language
notices; granting the Department and DOC rulemaking

1 authority; granting the Office of Management and
2 Enterprise Services certain technical and security-
3 standard-setting authority; directing the Department
4 and DOC to submit quarterly written reports during
5 pilot phase; providing required report contents;
6 requiring reports be made available to the public;
7 requiring the TAP platform be interoperable with
8 certain programs of the Department and DOC;
9 clarifying ownership of data; clarifying that the
10 Department and DOC shall be responsible for
11 oversight; prohibiting participants and supervised
12 individuals from being sanctioned, denied benefits,
13 or found in violation solely because of a technical
14 failure of the TAP platform; directing for inclusion
15 of system failures in reports; creating the
16 Supplemental Nutrition Assistance Program Integrity
17 Overlay Revolving Fund; creating the Corrections
18 Transparency Overlay Revolving Fund; identifying
19 funding sources; providing purpose of funds;
20 providing for noncodification; providing for
21 codification; and providing an effective date.

22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589
590
591
592
593
594
595
596
597
598
599
600
601
602
603
604
605
606
607
608
609
610
611
612
613
614
615
616
617
618
619
620
621
622
623
624
625
626
627
628
629
630
631
632
633
634
635
636
637
638
639
640
641
642
643
644
645
646
647
648
649
650
651
652
653
654
655
656
657
658
659
660
661
662
663
664
665
666
667
668
669
670
671
672
673
674
675
676
677
678
679
680
681
682
683
684
685
686
687
688
689
690
691
692
693
694
695
696
697
698
699
700
701
702
703
704
705
706
707
708
709
710
711
712
713
714
715
716
717
718
719
720
721
722
723
724
725
726
727
728
729
730
731
732
733
734
735
736
737
738
739
740
741
742
743
744
745
746
747
748
749
750
751
752
753
754
755
756
757
758
759
760
761
762
763
764
765
766
767
768
769
770
771
772
773
774
775
776
777
778
779
780
781
782
783
784
785
786
787
788
789
790
791
792
793
794
795
796
797
798
799
800
801
802
803
804
805
806
807
808
809
810
811
812
813
814
815
816
817
818
819
820
821
822
823
824
825
826
827
828
829
830
831
832
833
834
835
836
837
838
839
840
841
842
843
844
845
846
847
848
849
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869
870
871
872
873
874
875
876
877
878
879
880
881
882
883
884
885
886
887
888
889
890
891
892
893
894
895
896
897
898
899
900
901
902
903
904
905
906
907
908
909
910
911
912
913
914
915
916
917
918
919
920
921
922
923
924
925
926
927
928
929
930
931
932
933
934
935
936
937
938
939
940
941
942
943
944
945
946
947
948
949
950
951
952
953
954
955
956
957
958
959
960
961
962
963
964
965
966
967
968
969
970
971
972
973
974
975
976
977
978
979
980
981
982
983
984
985
986
987
988
989
990
991
992
993
994
995
996
997
998
999
1000

BE IT ENACTED BY THE PEOPLE OF THE STATE OF OKLAHOMA:

SECTION 1. NEW LAW A new section of law to be codified
in the Oklahoma Statutes as Section 11010.1 of Title 74, unless
there is created a duplication in numbering, reads as follows:

This act shall be known and may be cited as the "Transparency
and Accountability Platform (TAP) Act".

SECTION 2. NEW LAW A new section of law to be codified
in the Oklahoma Statutes as Section 11010.2 of Title 74, unless
there is created a duplication in numbering, reads as follows:

As used in this act:

1 1. "Cryptographic assertion" means a nonbiometric,
2 cryptographically secured message from a device indicating the
3 result of an on-device biometric check such as success or failure
4 without transmitting biometric data;

5 2. "Decentralized, on-device biometric authentication" means
6 biometric recognition performed entirely on a user's device, wherein
7 biometric identifiers and templates never leave the device and are
8 never stored or shared with the Department of Human Services
9 (Department), the State Department of Corrections (DOC), the
10 Transparency and Accountability Platform (TAP) provider, or any
11 third party;

12 3. "Event" means a defined interaction relevant to program
13 integrity or supervision, including but not limited to:

14 a. for the Supplemental Nutrition Assistance Program
15 (SNAP): enrollment, recertification, account
16 creation, device registration, or other high-risk
17 transactions, and

18 b. for the Department of Corrections: supervision of
19 check-ins, curfew verifications, program or treatment
20 attendance, and other required contacts;

21 4. "Participant" means an applicant for, or recipient of, SNAP
22 or related Department of Human Services-administered benefits;

23 5. "Supervised individual" means a person under the authority
24 or supervision of the Department of Corrections, including, but not

1 limited to, parole, probation, community supervision, or similar
2 status;

3 6. "Thin overlay" means a technology layer that interfaces with
4 existing eligibility, case management, supervision, and payment
5 systems without replacing those core systems; and

6 7. "Transparency and Accountability Platform" or "TAP platform"
7 means a digital platform, implemented as a thin overlay to existing
8 systems, which provides, at a minimum:

- 9 a. decentralized, on-device biometric authentication,
- 10 b. geolocation or geofence-based verification of events,
- 11 c. cryptographic timestamping of events, and
- 12 d. an automated policy rules engine or logic layer to
13 evaluate events for fraud, noncompliance, or anomalies
14 in real time.

15 SECTION 3. NEW LAW A new section of law to be codified
16 in the Oklahoma Statutes as Section 11010.3 of Title 74, unless
17 there is created a duplication in numbering, reads as follows:

18 A. The Transparency and Accountability Platform (TAP platform)
19 is hereby established as a statewide technology framework to
20 support:

21 1. A Supplemental Nutrition Assistance Program (SNAP) Integrity
22 Overlay administered by the Department of Human Services
23 (Department); and
24

1 2. A Corrections Transparency Overlay administered by the State
2 Department of Corrections (DOC).

3 B. The Department and DOC are authorized to procure, deploy,
4 operate, and require the use of the TAP platform within their
5 respective program areas, in coordination with the Office of
6 Management and Enterprise Services and subject to state procurement
7 laws.

8 C. The TAP platform shall be designed and implemented as a thin
9 overlay, interoperable with existing state systems, and shall not
10 require replacement of existing core eligibility, supervision, or
11 payment systems.

12 SECTION 4. NEW LAW A new section of law to be codified
13 in the Oklahoma Statutes as Section 11010.4 of Title 74, unless
14 there is created a duplication in numbering, reads as follows:

15 A. The Department of Human Services (Department) shall
16 implement the TAP platform as a Supplemental Nutrition Assistance
17 Program (SNAP) Integrity Overlay for the following purposes:

18 1. To verify the identity of participants during enrollment,
19 recertification, and device registration through decentralized, on-
20 device biometrics;

21 2. To associate defined events with geolocation and
22 cryptographic timestamps to the extent permitted by federal SNAP law
23 and guidance;

24

1 3. To support detection and deterrence of identity-based fraud,
2 skimming, cloning, and stolen benefit misuse; and

3 4. To provide dashboards, audit logs, and analytics for
4 oversight, reporting, and fraud investigation.

5 B. The Department shall implement an initial pilot program
6 using the TAP platform:

7 1. Pilot launch shall occur within six (6) months of receipt of
8 funding appropriated for this purpose;

9 2. The pilot shall run for a duration of not less than six (6)
10 months and not more than twelve (12) months;

11 3. The pilot may be limited to designated geographic areas or
12 participant populations; and

13 4. The Department shall submit quarterly reports to the
14 Legislature during the pilot period, including fraud metrics, access
15 issues, and administrative impacts.

16 C. After completion of the pilot and review of the reports
17 required by this act, the Department is authorized to expand the
18 SNAP Integrity Overlay statewide, subject to any additional
19 conditions or modifications enacted by the Legislature.

20 D. Participation in TAP-enabled platform processes shall be
21 administered in a manner consistent with federal SNAP eligibility,
22 cooperation, and nondiscrimination requirements, and no participant
23 shall be denied or terminated from SNAP solely due to technical
24 failure of the TAP platform.

1 SECTION 5. NEW LAW A new section of law to be codified
2 in the Oklahoma Statutes as Section 11010.5 of Title 74, unless
3 there is created a duplication in numbering, reads as follows:

4 A. The State Department of Corrections (DOC) shall implement
5 the TAP platform as a Corrections Transparency Overlay for the
6 following purposes:

7 1. To verify the identity of supervised individuals at
8 enrollment and during required check-ins, curfew verifications, and
9 program attendance through decentralized, on-device biometrics;

10 2. To associate such supervision events with geofenced location
11 data and cryptographic timestamps;

12 3. To provide officers, supervisors, courts, and boards with
13 dashboards and immutable audit logs of compliance and violations;
14 and

15 4. To support automated alerts when events are missed, late, or
16 out of authorized locations, pursuant to DOC rules.

17 B. The DOC shall implement an initial pilot program using the
18 TAP platform:

19 1. The pilot program shall commence within three (3) months to
20 six (6) months of receipt of funding appropriated for this purpose;

21 2. The pilot program shall run for a duration of approximately
22 twelve (12) months;

23 3. The pilot program may be limited to selected supervision
24 populations or regions; and

1 4. The DOC shall submit quarterly reports to the Legislature
2 during the pilot period, including compliance outcomes, officer
3 workload impacts, and system performance.

4 C. After completion of the pilot program and review of the
5 reports required by this act, the DOC is authorized to expand the
6 Corrections Transparency Overlay statewide, subject to any
7 additional conditions or modifications enacted by the Legislature.

8 D. Use of the TAP platform for supervision shall be limited to
9 purposes reasonably related to conditions of supervision and public
10 safety, and technical failures shall be considered in evaluating
11 alleged violations.

12 SECTION 6. NEW LAW A new section of law to be codified
13 in the Oklahoma Statutes as Section 11010.6 of Title 74, unless
14 there is created a duplication in numbering, reads as follows:

15 A. 1. Biometric identifiers and templates used for
16 authentication under this act shall remain on the participant's or
17 supervised individual's device (or a designated secure device) and
18 shall not be transmitted to, stored by, or shared with the
19 Department of Human Services (Department), the State Department of
20 Corrections (DOC), the TAP platform provider, or any third party.

21 2. The TAP platform may receive only nonbiometric cryptographic
22 assertions indicating whether on-device biometric authentication
23 succeeded or failed. Such assertions shall not contain biometric
24

1 data and shall not be usable to reconstruct any biometric
2 identifier.

3 B. 1. The Department and DOC may receive and maintain non-
4 biometric data, including event identifiers, device identifiers,
5 geolocation data, timestamps, and compliance status derived from
6 policy logic; and

7 2. Access to such data shall be restricted to authorized
8 personnel, governed by written policies, and recorded in tamper-
9 evident audit logs.

10 C. 1. For the Department, data from the TAP platform shall be
11 used only for administration, integrity, and oversight of the
12 Supplemental Nutrition Assistance Program (SNAP) and directly
13 related human-services programs;

14 2. For the DOC, data from the TAP platform shall be used only
15 for administration and oversight of supervision and related
16 correctional purposes; and

17 3. Data collected under this act shall not be used for
18 unrelated general surveillance or for commercial purposes.

19 D. 1. The Department shall retain nonbiometric TAP platform
20 data only as necessary to comply with federal SNAP requirements,
21 state records laws, and applicable privacy protections;

22 2. The DOC shall retain nonbiometric TAP platform data only as
23 necessary to comply with DOC policy, criminal justice information
24 system requirements, and state records laws; and

1 3. All nonbiometric data shall be protected by encryption in
2 transit and at rest and by tamper-evident logging of access and
3 changes.

4 E. The Department and DOC shall provide clear, plain language
5 notices to participants and supervised individuals describing the
6 use of the TAP platform, what data is collected, how it is used, how
7 long it is retained, and how records may be challenged.

8 SECTION 7. NEW LAW A new section of law to be codified
9 in the Oklahoma Statutes as Section 11010.7 of Title 74, unless
10 there is created a duplication in numbering, reads as follows:

11 A. The Department of Human Services (Department) is authorized
12 to promulgate rules for the Supplemental Nutrition Assistance
13 Program (SNAP) Integrity Overlay, including, but not limited to:

- 14 1. Enrollment and device registration procedures;
- 15 2. Use of TAP platform assertions in eligibility and fraud
16 investigations;
- 17 3. Appeals and identity-challenge processes;
- 18 4. Reporting, timelines, and data retention policies; and
- 19 5. Alternative procedures for individuals unable to use TAP
20 platform technology.

21 B. The State Department of Corrections (DOC) is authorized to
22 promulgate rules for the Corrections Transparency Overlay,
23 including, but not limited to:

- 24 1. Enrollment and device assignment procedures;

- 1 2. Use of TAP platform data in supervision decisions and
- 2 violation reports;
- 3 3. Appeals, dispute, and correction processes;
- 4 4. Data retention and access policies consistent with Criminal
- 5 Justice Information Systems and other standards; and
- 6 5. Officer training and use of dashboards and alerts.

7 C. The Office of Management and Enterprise Services may adopt
8 technical and security standards to ensure interoperability,
9 cybersecurity, and consistent implementation of the TAP platform
10 across agencies.

11 SECTION 8. NEW LAW A new section of law to be codified
12 in the Oklahoma Statutes as Section 11010.8 of Title 74, unless
13 there is created a duplication in numbering, reads as follows:

14 A. During each pilot phase, the Department of Human Services
15 (Department) and the State Department of Corrections (DOC) shall
16 submit quarterly written reports to the President Pro Tempore of the
17 Oklahoma State Senate, the Speaker of the Oklahoma House of
18 Representatives, and relevant oversight committees.

19 B. Reports from the Department shall include, at a minimum:

- 20 1. Estimates of reductions in fraud and improper payments;
- 21 2. Impacts on processing times and administrative workload;
- 22 3. Access and usability issues, including impacts on older
- 23 adults and rural participants; and
- 24 4. Recommendations for statewide expansion or modification.

1 C. Reports from the DOC shall include, at a minimum:

- 2 1. Compliance rates and changes in violations or absconding
- 3 incidents;
- 4 2. Impacts on officer workload and supervision efficiency;
- 5 3. System performance and failure incidents; and
- 6 4. Recommendations for statewide expansion or modification.

7 D. Reports shall be made available to the public, with
8 personally identifiable information removed or redacted in
9 accordance with state and federal law.

10 SECTION 9. NEW LAW A new section of law to be codified
11 in the Oklahoma Statutes as Section 11010.9 of Title 74, unless
12 there is created a duplication in numbering, reads as follows:

13 A. The TAP platform shall, to the extent practicable, be
14 interoperable with:

15 1. The Department of Human Services' (Department) eligibility
16 and case management systems and electronic benefit transfer (EBT)
17 processors;

18 2. The State Department of Corrections' (DOC) case management
19 and supervision systems, as well as court and parole board
20 information systems;

21 3. The Office of Management and Enterprise Services' (OMES)
22 identity and security services; and

23 4. Applicable federal systems and standards.

1 B. The state shall retain ownership of its data and
2 configurations created under contracts implementing the TAP
3 platform, and vendors shall retain intellectual property rights in
4 their pre-existing and general purpose technologies, subject to
5 license terms negotiated in procurement.

6 SECTION 10. NEW LAW A new section of law to be codified
7 in the Oklahoma Statutes as Section 11010.10 of Title 74, unless
8 there is created a duplication in numbering, reads as follows:

9 A. The Department of Human Services (Department) and the State
10 Department of Corrections (DOC) shall each be responsible for
11 oversight of their respective implementations of the TAP platform
12 and for mitigating the effects of system failures.

13 B. No participant or supervised individual shall be sanctioned,
14 denied benefits, or found in violation solely because of a technical
15 failure of the TAP platform, including outages, connectivity issues,
16 or erroneous system outputs, without appropriate review and
17 remediation.

18 C. System failures that materially affect program integrity or
19 supervision outcomes shall be documented and reported in the
20 periodic reports required by Section 8 of this act.

21 SECTION 11. NEW LAW A new section of law not to be
22 codified in the Oklahoma Statutes reads as follows:

23 A. There is hereby created in the State Treasury a revolving
24 fund for the Oklahoma Department of Human Services to be designated

1 the "Supplemental Nutrition Assistance Program Integrity Overlay
2 Revolving Fund". The fund shall be a continuing fund, not subject
3 to fiscal year limitations, and shall consist of all monies received
4 by the Department of Human Services from monies appropriated by the
5 Legislature, federal funds, grants, and other lawful funding
6 sources. All monies accruing to the credit of said fund are hereby
7 appropriated and may be budgeted and expended by the Department of
8 Human Services for the purpose of planning, developing, piloting,
9 and deploying the Supplemental Nutrition Assistance Program (SNAP)
10 Integrity Overlay and shall include:

- 11 1. Due diligence and federal compliance analysis;
- 12 2. Integration mapping and application development;
- 13 3. Backend system configuration and deployment;
- 14 4. Training, dashboards, and oversight tools; and
- 15 5. Pilot implementation and evaluation.

16 Expenditures from said fund shall be made upon warrants issued by
17 the State Treasurer against claims filed as prescribed by law with
18 the Director of the Office of Management and Enterprise Services for
19 approval and payment.

20 B. There is hereby created in the State Treasury a revolving
21 fund for the Oklahoma Department of Corrections to be designated the
22 "Corrections Transparency Overlay Revolving Fund". The fund shall
23 be a continuing fund, not subject to fiscal year limitations, and
24 shall consist of all monies received by the State Department of

1 Corrections from monies appropriated by the Legislature, federal
2 funds, grants, and other lawful funding sources. All monies
3 accruing to the credit of said fund are hereby appropriated and may
4 be budgeted and expended by the Oklahoma Department of Corrections
5 for the purpose of planning, developing, piloting, and deploying the
6 Corrections Transparency Overlay and shall include:

- 7 1. Requirements gathering and policy design;
- 8 2. Pilot deployment, including hardware and software;
- 9 3. Officer dashboards and mobile interfaces; and
- 10 4. Reporting and analytics tools.

11 Expenditures from said fund shall be made upon warrants issued by
12 the State Treasurer against claims filed as prescribed by law with
13 the Director of the Office of Management and Enterprise Services for
14 approval and payment.

15 SECTION 12. This act shall become effective November 1, 2026.

16

17 60-2-16443 TJ 02/17/26

18

19

20

21

22

23

24