

1 STATE OF OKLAHOMA

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

3 HOUSE BILL 4110

By: Ford

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6 AS INTRODUCED

7 An Act relating to state government; creating the
8 Transparency and Accountability Platform (TAP) Act;
9 providing definitions; establishing TAP platform to
support a Supplemental Nutrition Assistance Program
(SNAP) Integrity Overlay and a Corrections
10 Transparency Overlay; authorizing the Department of
Human Services (Department) and Department of
Corrections (DOC) to procure and deploy the TAP
platform in coordination with the Office of
Management and Enterprise Services; clarifying the
11 TAP platform shall be a thin overlay and not require
replacement of core eligibility, supervision, or
payment systems; identifying the purposes for which
the Department shall implement the TAP platform;
12 directing the Department to implement an initial
pilot program; authorizing the Department to expand
the SNAP Integrity Overlay statewide after completion
and review of pilot program; clarifying participation
13 in TAP-enabled processes shall be consistent with
federal SNAP eligibility; identifying the purposes
for which the DOC shall implement the TAP platform;
14 directing the DOC to implement an initial pilot
program; authorizing Department to expand the
Corrections Transparency Overlay statewide after
15 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 non-
16 biometric cryptographic assertions; allowing the
Department and DOC to receive and maintain non-
biometric data; limiting uses and retention of
17 collected data; directing the Department and DOC to
provide clear, plain language notices; granting the
Department and DOC rulemaking authority; granting the
18 Office of Management and Enterprise Services certain
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technical and security standard setting authority; directing the Department and DOC to submit quarterly written reports during pilot phase; providing required report contents; requiring reports be made available to the public; requiring the TAP platform be interoperable with certain programs of the Department and DOC; clarifying ownership of data; clarifying that the Department and DOC shall be responsible for oversight; prohibiting participants and supervised individuals from being sanctioned, denied benefits, or found in violation solely because of a technical failure of the TAP platform; directing for inclusion of system failures in reports; making appropriations for each program; identifying funding source; providing purpose of funds; providing for noncodification; providing for codification; and providing an effective date.

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 Act" or the "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. "Cryptographic assertion" means a non-biometric, cryptographically secured message from a device indicating the

1 result of an on-device biometric check (such as success or failure)
2 without transmitting biometric data;

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

10 3. "Event" means a defined interaction relevant to program
11 integrity or supervision, including but not limited to:
12 a. for Supplemental Nutrition Assistance Program (SNAP):
13 enrollment, recertification, account creation, device
14 registration, or other high-risk transactions, and
15 b. for Department of Corrections: supervision of check-
16 ins, curfew verifications, program or treatment
17 attendance, and other required contacts;

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

20 5. "Supervised individual" means a person under the authority
21 or supervision of the Department of Corrections, including, but not
22 limited to, parole, probation, community supervision, or similar
23 status;

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

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

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

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

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

19 1. A Supplemental Nutrition Assistance Program (SNAP) Integrity
20 Overlay administered by the Oklahoma Department of Human Services
21 (Department); and

22 2. A Corrections Transparency Overlay administered by the
23 Oklahoma Department of Corrections (DOC).

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

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

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

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

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

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

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

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

3 B. The Department shall implement an initial pilot program
4 using the TAP platform:

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

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

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

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

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

18 D. Participation in TAP-enabled platform processes shall be
19 administered in a manner consistent with federal SNAP eligibility,
20 cooperation, and nondiscrimination requirements, and no participant
21 shall be denied or terminated from SNAP solely due to technical
22 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 Oklahoma 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 Oklahoma
19 Department of Human Services (Department), the Oklahoma Department
20 of Corrections (DOC), the TAP platform provider, or any third party.

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

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1 | contain biometric data and shall not be usable to reconstruct any
2 | biometric 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 non-biometric TAP platform
20 | data only as necessary to comply with federal SNAP requirements,
21 | state records laws, and applicable privacy protections;

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

1 3. All non-biometric 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 Oklahoma Department of Human Services (Department) is
12 authorized to promulgate rules for the Supplemental Nutrition
13 Assistance Program (SNAP) Integrity Overlay, including, but not
14 limited to:

15 1. Enrollment and device registration procedures;
16 2. Use of TAP platform assertions in eligibility and fraud
17 investigations;

18 3. Appeals and identity-challenge processes;
19 4. Reporting, timelines, and data retention policies; and
20 5. Alternative procedures for individuals unable to use TAP
21 platform technology.

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

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

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

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

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

20 B. Reports from the Department shall include, at a minimum:
21 1. Estimates of reductions in fraud and improper payments;
22 2. Impacts on processing times and administrative workload;
23 3. Access and usability issues, including impacts on older
24 adults and rural participants; and

1 4. Recommendations for statewide expansion or modification.

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

3 1. Compliance rates and changes in violations or absconding
4 incidents;

5 2. Impacts on officer workload and supervision efficiency;

6 3. System performance and failure incidents; and

7 4. Recommendations for statewide expansion or modification.

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

11 SECTION 9. NEW LAW A new section of law to be codified

12 in the Oklahoma Statutes as Section 11010.9 of Title 74, unless
13 there is created a duplication in numbering, reads as follows:

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

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

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

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

24 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 Oklahoma Department of Human Services (Department) and
10 the Oklahoma Department of Corrections (DOC) shall each be
11 responsible for oversight of their respective implementations of the
12 TAP platform 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 7 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. For the purpose of planning, developing, piloting, and
24 deploying the Supplemental Nutrition Assistance Program (SNAP)

1 Integrity Overlay, there is hereby appropriated from any monies in
2 the State Treasury not otherwise appropriated the sum of Three
3 Million Dollars (\$3,000,000.00) to the Oklahoma Department of Human
4 Services (Department) for:

- 5 1. Due diligence and federal compliance analysis;
- 6 2. Integration mapping and application development;
- 7 3. Backend system configuration and deployment;
- 8 4. Training, dashboards, and oversight tools; and
- 9 5. Pilot implementation and evaluation.

10 B. For the purpose of planning, developing, piloting, and
11 deploying the Corrections Transparency Overlay, there is hereby
12 appropriated from any monies in the State Treasury not otherwise
13 appropriated the sum of Two Million Dollars (\$2,000,000.00) to the
14 Oklahoma Department of Corrections (DOC) for:

- 15 1. Requirements gathering and policy design;
- 16 2. Pilot deployment, including hardware and software;
- 17 3. Officer dashboards and mobile interfaces; and
- 18 4. Reporting and analytics tools.

19 C. The Department and DOC may seek and accept federal funds,
20 grants, and other lawful funding sources to supplement these
21 appropriations.

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

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