

## COMPLIANCE ASSESSMENT · CONTRACT REVIEW ITEM #7

# 360° SCD Hub — Texas SB 2420 Applicability Assessment

App Store Accountability Act (Tex. Bus. & Com. Code ch. 121) — developer applicability for the 360° SCD Hub mobile application.

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**BOTTOM LINE:** The 360° SCD Hub is substantially aligned with SB 2420. The law's primary mechanics — age verification, parental consent, and age-category signaling — sit with the app-store operators (Apple, Google). The developer-side duties are largely in place or low-effort, and an onboarding age-verification + Terms acceptance gate is already live. Risk profile: LOW.

## 1 · Purpose & Scope

This assessment responds to Item #7 of the SCFA board contract review, which asked whether the developer obligations under Texas SB 2420 (the App Store Accountability Act, "ASAA") are understood and applied to the 360° SCD Hub. It summarizes what the statute requires, which duties fall on app-store operators versus developers, how those duties map to the Hub as it is built and distributed today, a risk rating, and a short list of recommended actions.

## 2 · The Law at a Glance

- **Status:** Signed May 27, 2025; statutory effective date January 1, 2026. Enforcement became active June 4, 2026, after the U.S. Court of Appeals for the Fifth Circuit lifted the injunction that had paused the law.
- **Who it regulates:** two entities — app-store owners (e.g., Apple, Google) and application developers who make products available to users in Texas.
- **Who it applies to:** requirements attach to new store accounts created in Texas on or after June 4, 2026; pre-existing accounts are exempt.
- **Age categories:** child (under 13), younger teenager (13–15), older teenager (16–17), and adult (18+).
- **Enforcement:** parents/guardians may bring civil actions (injunctive relief, actual and punitive damages, attorney's fees); violations are also actionable under the Texas Deceptive Trade Practices Act. Press coverage reports exposure of up to \$10,000 per violation under the deceptive-trade framework. Remedies are cumulative.

## 3 · Who Carries Each Duty

Most of the heavy lifting is store-side. The 360° SCD Hub is distributed through the Apple App Store and Google Play as BuddyBoss-wrapped native apps, so Apple and Google — as the app-store owners — perform the age verification, parental-consent collection, and age-signal delivery for new Texas accounts.

| App-store operator (Apple / Google)                  | Application developer (FFH / SCFA)              |
|------------------------------------------------------|-------------------------------------------------|
| Verify each Texas user's age; assign one of four age | Assign an age rating to the app and each in-app |

|                                                                                                         |                                                                                                                                        |
|---------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| categories                                                                                              | purchase, with reasons (§121.052)                                                                                                      |
| Affiliate minor accounts with a verified parent/guardian; obtain parental consent per download/purchase | Use store-provided signals to verify each user's age category and parental-consent status (§121.054)                                   |
| Notify developers of consent revocation; require renewed consent on significant changes                 | Notify each store before significant changes to terms, privacy, data practices, ratings, monetization, or functionality (§121.053)     |
| Display age ratings/content notices; provide developers age category + consent status                   | Use store-provided personal data only for age enforcement, legal compliance, and safety features; delete after verification (§121.055) |
| Minimize data collection; cannot enforce contracts against unconsented minors                           | Do not enforce contracts against unconsented minors, misrepresent ratings, or share ASAA-acquired data (§121.056)                      |

## 4 · Applicability to the 360° SCD Hub

Mapping each developer-side duty to the Hub as built and distributed today:

| §       | Developer duty                                                       | Status      | Notes                                                                                                                       |
|---------|----------------------------------------------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------|
| 121.052 | Assign age rating + reasons; provide to each store                   | In place    | App carries an age/content rating in both consoles; document the rating reasons.                                            |
| 121.054 | Consume store age-category + parental-consent signals                | In progress | Verify/integrate Apple Declared Age Range / PermissionKit and Google equivalents during the current enhancement engagement. |
| 121.053 | Notify stores before significant changes                             | Low effort  | Adopt a lightweight pre-release checklist.                                                                                  |
| 121.055 | Restrict + delete store-provided personal data                       | Aligned     | Hub collects minimal personal data; confirm any store age data is not retained beyond verification.                         |
| 121.056 | No minor-contract enforcement; no misrepresentation; no data sharing | Aligned     | Confirm Terms do not purport to bind minors absent consent.                                                                 |

## 5 · Controls Already in Place

- **Onboarding age gate + Terms acceptance.** New users are presented with an age-verification step and must accept the Terms & Agreements before entering the app — a developer-side control that gates entry and supports appropriate handling of minors, beyond the store-level mechanics.
- **Store age ratings.** The Hub carries an age/content rating in both the Apple App Store and Google Play consoles.

- **Low-risk content & data profile.** The Hub is a health-education and community platform for sickle cell disease — not minor-targeted monetized gaming — with minimal personal-data collection, which materially lowers the compliance surface.

## 6 · Risk Rating

### LOW

Store-side operators carry most obligations; the developer-side duties are largely satisfied or low-effort; data collection is minimal; content is non-monetized health education; and an age gate + Terms control is already live. No gap identified that affects the Hub's lawful availability in Texas as of this assessment.

## 7 · Recommended Actions

1. Document the app's age rating and rating reasons in App Store Connect and Google Play Console (§121.052). **Owner: FFH dev.**
2. Verify / integrate consumption of store age-category and parental-consent signals (Apple Declared Age Range / PermissionKit; Google equivalents), folded into the current enhancement engagement (§121.054). **Owner: FFH dev + enhancement contract.**
3. Adopt a “notify the stores before significant changes” pre-release checklist (§121.053). **Owner: FFH dev.**
4. Confirm the data-use and deletion policy for any store-provided personal data (§121.055). **Owner: FFH dev.**
5. Review app Terms & Privacy to ensure minors are not bound absent consent and ratings are not misrepresented (§121.056). **Owner: FFH + SCFA.**
6. Maintain the onboarding age-verification + Terms acceptance gate already live (supporting control). **Owner: FFH dev.**

## 8 · Conclusion

The 360° SCD Hub is substantially aligned with SB 2420. The law's primary obligations sit with Apple and Google; the developer-side items are largely in place or low-effort and are best completed within the current enhancement engagement, where age-handling can be designed in deliberately. We recommend closing the open items above as part of the next Android/iOS pass and documenting the result in the contract closeout packet.

### Disclaimer

*This assessment is provided by The Force for Health Network for planning purposes and is not legal advice. SB 2420 is newly in force and subject to ongoing litigation and evolving app-store implementations. SCFA should confirm final compliance with qualified legal counsel.*

### Sources

- Tex. S.B. 2420, 89th Leg. (App Store Accountability Act), §§121.021–121.056, 121.101–121.103.
- Reed Smith, “Texas law requires age verification for app stores and developers” (developer obligations §§121.052–121.056).
- Texas Tribune (May 28, 2026) and Tech Times (June 9, 2026) — Fifth Circuit lifting of injunction; June 4, 2026 effective enforcement; penalty reporting.