



CR 102 Memorandum

Regarding acceptable forms of identification

Date: June 4, 2025
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Background

Acceptable forms of identification that liquor licensees may use to verify a person's age for eligibility to purchase alcohol are found at [WAC 314-11-025](#). The companion rule for purchase of cannabis is at [WAC 314-55-150](#). With the passage of [Initiative 1183](#) in 2013 that provided for the privatization of liquor sales, a statute on acceptable forms of identification at RCW 66.16.040 was repealed.

In April 2023, the Washington State Liquor & Cannabis Board (Board) [accepted](#) a petition requesting to add global entry cards to the list of acceptable forms of identification in WAC 314-11-025. In July 2023, the Board [accepted](#) the parts of a petition for rulemaking requesting to remove references to RCW 66.16.040 from [WAC 314-01-005](#), [WAC 314-17-025](#) and [WAC 314-17-110](#).

Stakeholder Engagement

On January 21 and January 23, the LCB held two virtual public stakeholder meetings regarding acceptable forms of identification.

Estimated Costs of Compliance

Under the Regulatory Fairness Act (RFA) in chapter 19.85 RCW, agencies are required to consider the costs that complying with the proposed rules will impose on businesses, unless the proposed rules are subject to an exemption to this requirement. The CR 102 form describes these exemptions in more detail. The proposed rule amendments do not impose any significant regulatory burden on licensees.

Rule Necessity

The purpose of this rule proposal is to update outdated statutory references in rule, and to add two types of federal identification to [WAC 314-11-025](#) and [WAC 314-55-150](#) in response to rulemaking petitions accepted by the board from members of the public.

Description of Rule Changes

The proposed amendments to the existing rules include:

- Remove obsolete references to RCW 66.16.040 from WAC 314-01-005, WAC 314-17-025 and WAC 314-17-110.
- Adding two forms of identification to verify a person's age for alcohol in WAC 314-11-025 and for cannabis in WAC 314-55-150. These two forms are the Global Entry Card and the Permanent Resident Card (commonly known as a "Green Card").