



CR 103 Memorandum

Regarding acceptable forms of identification

Date: October 8, 2025
Presented by: Jeff Kildahl, Policy and Rules Coordinator

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provided for the privatization of liquor sales, a statute on acceptable forms of identification at RCW 66.16.040 was repealed.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 Permanent Resident Cards (commonly known as a "Green Cards") and 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.

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The purpose of this rule proposal is to update outdated statutory references in rule, and to add two types of federal identification to WAC 314-11-025 and WAC 314-55-150 in response to rulemaking petitions accepted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 amendments to the existing rules include:

- Removing 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").

Differences between proposed rules (CR 102) and final rules (CR 103):

- For the final rules (CR 103), the Board added language to WAC 314-11-025(4) for alcohol and WAC 314-55-150(3) for cannabis stating the following regarding compliance with other applicable state laws:

Licensees must comply with all applicable state laws, including chapter 49.60 RCW, in the course of their operation. This rule does not authorize distinction or differential treatment on the basis of any protected class listed in RCW 49.60.030(1).