

College Procedure: 304.25 – Identity Verification Procedure

Policy Reference: 304 – Campus Safety and Security
Responsible Department: Facilities & Public Safety
Approval Authority: Cabinet
Procedure Owner: Vice President, Facilities & Public Safety
Effective Date: 12/15/2025

Version Number: 1
Legal Counsel Reviewed (yes/no): No
Legal Reference(s): N/A
Scope: College-wide

Reason for Procedure

The purpose of this procedure is to provide a framework for maintaining safety and accountability by ensuring individuals can be identified when on college property, while respecting personal rights and necessary exceptions.

The Procedure

General Requirements

1. Masks and face coverings are generally allowed on campus for any personal, medical, cultural, or practical reason. Wearing a face covering is not a violation of this procedure.
2. This procedure applies only when a face covering prevents reasonable identification during a safety, security, or policy-related interaction.
3. Individuals must be prepared to provide valid identification upon request from authorized College personnel while inside campus buildings or during College activities.
4. When an individual's face is obscured in a way that prevents reasonable recognition, an authorized official may request valid state-issued or College-issued photo identification. In most cases, presentation of identification is sufficient.
5. If an individual's behavior or circumstances create a reasonable safety or security concern, such as refusal to identify, attempting to access unauthorized areas, or engaging in evasive or suspicious conduct, an authorized official may request a brief and respectful temporary removal of a face covering to verify identity. Requests must be:
 - Limited to the shortest time necessary
 - Conducted professionally

- Performed in a private or semi-private location whenever possible
6. Individuals wearing religious or cultural face coverings will not be asked to remove them. Alternate verification, such as reviewing photo identification or following a prearranged accommodation, will be used instead.
 7. Common reasons individuals may wear face coverings include:
 - Medical or health purposes
 - Religious or cultural practices
 - Occupational safety and PPE requirements
 - Severe weather protection
 - Participation in College-approved events, performances, or educational activities
 8. These examples are not exhaustive. The presence of a face covering alone is not a violation and does not by itself justify an enforcement action.

Appearance-Based Safety Concern

Identity verification may be requested when an individual's manner of dress, equipment, or concealment of identity prevents reasonable recognition and presents an objectively unusual or alarming appearance that creates a reasonable, articulable safety or security concern. This includes situations in which:

- The individual's appearance is substantially inconsistent with any of the permitted exceptions in this procedure, and
- The appearance is associated with known safety risks or pre-incident indicators, even without additional behavioral cues.

In such circumstances, the appearance itself constitutes a sufficient basis for identity verification. Requests for identification under this provision must not be based on race, ethnicity, national origin, gender, or other protected characteristics, but solely on the safety implications of identity concealment or gear being worn.

Identification and Verification

Authorized officials may request identification when necessary to address a safety, security, or policy concern. Presentation of identification is typically sufficient. Temporary removal of a face covering is a last resort and will not be requested of individuals wearing religious or cultural coverings. All requests must be respectful, minimally intrusive, and limited to confirming identity.

Accommodations

Some individuals may be unable to remove a face covering due to religious beliefs, disability, or other documented conditions. Students who require accommodations may contact the Dean of Students Office or Accommodations. Employees may contact Human Resources. Approved accommodations may include alternate methods of verification that do not require removal of the face covering.

No individual will be denied access solely because they have requested or received an accommodation related to face coverings and identity verification.

Prohibited Conduct

The following actions are prohibited:

- Intentional concealment of identity for unlawful, unauthorized, or disruptive purposes.
- Refusal to provide identification when requested during a safety or security situation.
- Use of a face covering to intimidate, harass, or interfere with College operations.

Enforcement

Failure to comply with a lawful and reasonable identification request may result in removal from College property, denial of access, or referral for disciplinary action as appropriate. Public Safety will document all interactions involving identity verification related to face coverings, including the reason for the request and the outcome. These records will be maintained to ensure consistency, accountability, and equitable application of this procedure.

Authorized personnel who act in good faith within the boundaries of this procedure and the reasonableness standard are acting within the scope of their duties, and their actions are protected by the College.

Reasonableness Standard

Actions taken under this procedure must be based on a reasonable, articulable safety or security concern as perceived by an authorized official at the time of the interaction. The standard is whether a similarly trained official, presented with the same circumstances, could reasonably believe that identity verification was necessary. Officers and other authorized personnel who act in good faith within this standard are acting within the scope of their duties, and their actions are protected by the College.

Commitment to Rights

Kirkwood Community College is dedicated to upholding constitutional freedoms including freedom of expression, religion, and privacy. Reasonable accommodations will be made for individuals with documented needs or legitimate reasons for wearing face coverings.

Procedure Review

This procedure will be reviewed annually by Public Safety in consultation with Student Services, Human Resources, legal counsel, and other relevant stakeholders.

Revision Log

Table 1 Revision Log

Version Number	Date Approved	Approved by	Description of Change
1	12/15/2025	Troy McQuillen, Vice President, Operations	New Procedure