



Applies to: Faculty, staff, graduate associates, student employees, students, volunteers, vendors, and all visitors (invitees and licensees) that acquire or seek to operate a UAS on any university property or at any university sponsored event.

Responsible Office

Office of Academic Affairs

POLICY

Issued: 11/20/2015
Edited: 12/22/2015

The Ohio State University is committed to providing an academically vigorous, safe, and secure environment for all individuals and organizations. Unmanned aircraft systems (UAS) offer opportunities for teaching and research and provide the university community with valuable experiences in a wide range of academic disciplines. Operation of UAS is regulated by the Federal Aviation Administration (FAA) and by federal, state, and local laws. Anyone who seeks to operate UAS on Ohio State property or at any university sponsored event must receive approval in advance in accordance with this policy.

Purpose of the Policy

To mitigate any risks to individuals and organizations potentially affected by UAS operations; ensure compliance with federal, state, and local laws, as well as regulations and contracts; and enable scholarship.

Definitions

Term	Definition
333 exemption	An FAA exemption under Section 333 of The Modernization and Reform Act of 2012 which grants an individual or entity the ability to operate a UAS for civil and non-governmental purposes and activities, other than recreational or hobbyist activity.
Certificate of Authorization (COA)	A certificate granted to an individual or entity by the FAA which outlines specific conditions for flight. The FAA may insert provisions during the approval process to ensure the UAS can be operated safely. A Public Use COA is granted to a public agency or organization to operate a specific aircraft for a specific purpose in a specific location. A Public Use COA is only issued after the process of determining public status, government use, and an operational and technical review.
Emergency	An urgent situation where action is taken to promote the safety and security of persons and/or property.
Invitee	Individuals or entities who visit Ohio State property, by invitation of a faculty member, staff member, or registered student organization for some purpose which benefits Ohio State.
Licensee	Individuals or entities who visit Ohio State property for their own benefit or pleasure, and are not invited by a faculty member, staff member, or registered student organization.
Model aircraft	An unmanned aircraft system that is (1) flown for hobby or recreational purposes, per section 336(c) of the FAA Modernization and Reform Act of 2012; (2) capable of sustained flight in the atmosphere; and (3) flown within visual line of sight of the aircraft operator. Must not exceed a weight of 55 pounds. Requires FAA registration and appropriate marking prior to any flight operation.
Reasonable expectation of privacy	Locations where there is an objective expectation of privacy. Examples include but are not limited to restrooms, locker rooms, residence halls, and health treatment and medical facilities.
University property	Any land, grounds, buildings, or facilities owned, leased, or used by The Ohio State University per formal contractual or legal agreements. Also included are university owned streets, sidewalks, and bike paths.
University sponsored event	Any Ohio State sanctioned, hosted, or affiliated event including but not limited to student meetings, athletic events, and university promotional gatherings.
Unmanned aircraft system (UAS)	Any remotely operated or controlled aircraft intended to fly within the National Airspace System. Includes devices commonly referred to as drones and may also include communications, support, and



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	navigational equipment. FAA regulations apply to all types of UAS regardless of weight or size. Model aircraft, a subset of UAS, have separate procedures detailed in this policy.

Policy Details

- I. The Office of Academic Affairs (OAA) will assist with processing requests for UAS activities consistent with applicable federal, state, and local laws and regulations and policy requirements. OAA will provide policy interpretation and respond to general inquiries regarding **UAS** activities.
- II. FAA regulations; federal, state, and local laws; and applicable university policies must be followed in conjunction with any UAS activities.
 - A. This includes but is not limited to FAA airmen certificate requirements, conditions of any airworthiness certificates, state law governing the safe operation of aircraft, and university policies regarding access to campus.
 - B. UAS operated in violation of any federal, state, or local laws or contract provisions will be subject to grounding.
- III. UAS owned by The Ohio State University will be operated under the authorization of the FAA.
 - A. This authorization could take the form of a **333 exemption** or a Public Use **Certificate of Authorization (COA)**, and will be limited to a specific location and outline the conditions, parameters, and limitations of flight operations.
 - B. Those operating UAS under a 333 exemption must also review and be aware of all FAA specifications, and file for any necessary amendments in advance.
- IV. Operation of any UAS on any **university property** or at any **university sponsored event** is prohibited unless first approved by the UAS Advisory Committee.
 - A. The UAS Advisory Committee reviews, assesses, approves, and provides guidance for UAS activities on university property or at any university sponsored events.
 - B. Any individual who seeks to operate a UAS must obtain UAS Advisory Committee approval in advance.
 - C. The Department of Public Safety will work in conjunction with the Office of Legal Affairs and local law enforcement jurisdictions for any university sponsored events that do not occur on university property.
- V. A UAS or **model aircraft** may not be used to monitor or record activities where there is a **reasonable expectation of privacy**.
 - A. Using a UAS to record or observe areas such as camps or campus settings where minors are cared for or taught is prohibited unless approved by the UAS Advisory Committee in advance.
 - B. UAS must not be used for unapproved recordings of any campus events or performances, or for any unlawful purpose.
- VI. Any individual or organization found to be operating a UAS on university property or at a university sponsored event in violation of their FAA-approved status, or any federal, state, and local laws or regulations, or in violation of applicable university policies, may be directed by authorized university representatives to cease operation of the UAS immediately unless or until approval is obtained. Violations will be referred to the university disciplinary process and will be considered regarding future UAS requests.
- VII. Under FAA guidelines, Temporary Flight Restrictions (TFR) may be implemented on university property or at any university sponsored event, which prohibit any type of UAS operations from taking place (e.g., university sporting events). As needed, the university may issue additional No Drone Zones on university property or at any university sponsored event, which prohibit any type of UAS operations from taking place.
- VIII. The operation of UAS by the Department of Public Safety and/or the university Emergency Operations Center (EOC) may be exempt from this policy based on the determination of **emergency** needs. During such operations the Department of Public Safety will follow internal department protocols.



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PROCEDURE

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- I. Obtaining approval for and operating a UAS (faculty, staff, graduate associates, student employees, students, volunteers, vendors, and **invitees**)
 - A. Individuals or organizations seeking to operate a UAS on university property or at a university sponsored event must submit a completed [UAS Request Form](#) to osurisk@osu.edu at least two weeks in advance.
 1. A COA, statement of reliance on and justification of operations under the university's 333 exemption, and/or other relevant documentation must also be included with the UAS Request Form.
 2. Individuals or organizations seeking to conduct UAS operations under the university's FAA approval, but not on university property or at a university sponsored event, must contact ORM directly.
 3. Vendors and invitees not operating UAS owned by the university must sign a written agreement holding the university harmless for any resulting claims, loss, or damage from flight operations, and attest to \$3 million of insurance covering UAS operations. The [language for this agreement](#) must be submitted to ORM along with the UAS Request Form.
 4. UAS are export controlled under U.S. Export Regulations, and some systems cannot be exported to foreign nationals. Individuals or organizations seeking to design, build, research, use in research, modify, dismantle, and/or operate a UAS must do so in accordance with such regulations and the Export Control policy. Before submitting a UAS Request Form, individuals and organizations must first discuss such any such activities with the Export Compliance Officer (exportcontrol@osu.edu) and obtain a Certificate of Export Review.
 - B. The Office of Risk Management (ORM) will process the request and conduct an initial suitability assessment.
 - C. After the suitability assessment, ORM will route the request to the UAS Advisory Committee after which the requestor will be notified of a decision or receive a request for additional information within 10 business days.
 - D. If approved, a copy of the approved UAS Request Form must be in possession of the operator at all times during flight activity, and must be presented to any university official or representative with control or jurisdiction over the activity, upon request.
 - E. UAS operators must only conduct approved flights under favorable conditions. If unforeseen circumstances develop (e.g., adverse weather) under which operations cannot be conducted in a safe manner, the operator must postpone the flight and request an extension from the UAS Advisory Committee within 3 business days of the original date. If the extension is not requested within 3 business days, a new UAS Request Form must then be completed and submitted.
- II. Obtaining approval and operating a UAS (**licensees**)
 - A. Licensees seeking to operate a UAS on university property or at a university sponsored event must submit a completed [UAS Request Form](#) to osurisk@osu.edu at least three weeks in advance.
 1. Any requests by licensees must include an FAA flight approval (in the form of a 333 exemption or COA) granted to the requestor, detailed maps of requested and FAA approved flight areas, a description of the rationale or purpose for the flight, and a detailed list of the individual(s) who will operate the UAS and their qualifications. ORM will provide direction to the requestor regarding any additional documentation required.
 1. Licensees must sign a written agreement holding the university harmless for any resulting claims, loss, or damage from flight operations, and attest to \$3 million of insurance covering UAS



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operations. The [language for this agreement](#) must be submitted to ORM along with the UAS Request Form.

- B. ORM will process the request and conduct an initial suitability assessment.
- C. After the suitability assessment, ORM will route the request to the UAS Advisory Committee after which the requestor will be notified of a decision or receive a request for additional information within 10 business days.
- D. If approved, a copy of the approved UAS Request Form must be in possession of the operator at all times during the activity, and must be presented to any university official or representative with control or jurisdiction over the activity, upon request.
- E. UAS operators must only conduct approved flights under favorable conditions. If unforeseen circumstances develop (e.g., adverse weather) under which operations cannot be conducted in a safe manner, the operator must postpone the flight and request an extension from the UASAC within 3 business days of the original date. If the extension is not requested within 3 business days, a new UAS Request Form must then be completed and submitted.

III. UAS Advisory Committee

- A. The UASAC may request additional information or clarification from the requestor, and may provide direction or other requirements for the UAS operation to take place.
- B. The UASAC will notify the requestor of a decision within 10 business days by way of response on the UAS Request Form.
- C. The UASAC is responsible for granting any process exemptions as necessary.
- D. The UASAC is responsible for confirming any FAA Temporary Flight Restrictions or university-issued No Drone Zones.
- E. The following university units will be represented on UASAC: the Offices of Academic Affairs, Environmental Health and Safety, Legal Affairs, Research, Research Compliance, Risk Management, Student Life, the Department of Public Safety, Facilities Operations and Development, and the Wexner Medical Center.
- F. The Office of Risk Management will maintain a record of the results and decisions of the UASAC.

IV. Accountability

- A. Individuals violating this policy will be held accountable for their actions, which may include but is not limited to:
 - 1. Volunteers are subject to reprimand or loss of volunteer status.
 - 2. Students are subject to the Code of Student Conduct.
 - 3. Staff and student employees are subject to corrective action up to and including termination.
 - 4. Faculty are subject to University Rule 3335-5-04. A finding of a policy violation may constitute gross incompetence or grave misconduct under Faculty Rule 3335-5-04(A).
- B. The university is not responsible for any damage resulting to a UAS. The operator will be responsible for any property damage or losses resulting from the operation of UAS.

V. Model Aircraft - Hobby and Recreational Use Only

- A. While model aircraft may be operated on university property or at a university sponsored event, any request for such flights must first be reviewed and approved by the UAS Advisory Committee using the same process outlined above.
 - 1. Any operator of a model aircraft must also follow the requirements below to ensure safety.
 - 2. Any model aircraft operator found to be operating in an unsafe manner may be prohibited from additional flights on Ohio State property.
- B. Requirements for operation of model aircraft on university property or at any university sponsored event:
 - 1. The model aircraft must only be operated for hobby or recreational purposes, and not for any commercial or research applications.
 - 2. The model aircraft must not exceed a weight of 55 pounds.



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3. The model aircraft must only be operated in a manner which does not interfere with the flight path or operation of other manned aircraft.
4. The model aircraft must not be flown within 5 nautical miles of an airport unless the airport control source or authority is first notified of the activity.
5. The model aircraft must be flown under 200 feet, and remain well clear of all surrounding obstacles such as utility lines, buildings, and other structures.
6. The model aircraft must not be flown over or above groups of people.
7. The model aircraft operator must not recklessly attempt to perform maneuvers that could result in injury or damage.
8. The model aircraft must remain within visual line of sight of the operator at all times. No flights may be operated during low light or nighttime conditions.
9. The model aircraft must be operated in accordance with any applicable community-based safety guidelines.
10. The model aircraft must not be used for the unapproved recording of individuals, performances, or campus events, or for any unlawful purpose.

Responsibilities

Position or Office	Responsibilities
Office of Academic Affairs	<ol style="list-style-type: none"> 1. Assist with processing requests for UAS activities consistent with applicable federal, state, and local laws and regulations and policy requirements. 2. Provide policy interpretation and respond to general inquiries regarding UAS activities.
Office of Risk Management	<ol style="list-style-type: none"> 1. Process requests to operate a UAS. 2. Conduct an initial suitability assessment. 3. Route requests to the UASAC. 4. Provide direction to requestors regarding requirements. 5. Maintain a record of UASAC results and decisions.
UAS Advisory Committee	<ol style="list-style-type: none"> 1. Review applications for operation of UAS on university property or at university sponsored events. 2. Notify requestors of decisions within 10 working days, or request additional information. 3. Confirm any Temporary Flight Restrictions (TFR) or No Drone Zones as applicable.
Faculty, staff, graduate associates, student employees, students, volunteers, approved university vendors, and invitees	<ol style="list-style-type: none"> 1. Obtain approval to operate a UAS on university property or at university sponsored events prior to doing so. All requests must be forwarded to osurisk@osu.edu at least <u>two weeks</u> in advance. 2. If applicable, sign a written hold harmless agreement and attest to the minimum amount of insurance coverage specified in the policy. 3. If applicable, follow export control requirements specified in the policy. 4. Do not operate a UAS unless approval has been granted. 5. Follow all federal, state, local, and university requirements governing UAS. 6. Observe and practice all specified safety precautions. 7. Do not monitor or record activities where there is a reasonable expectation of privacy. 8. Do not record or observe areas such as camps or campus settings where minors are cared for or taught unless prior approval is granted by the UAS Advisory Committee. 9. Do not use a UAS for any unlawful purpose.
Licensees	<ol style="list-style-type: none"> 1. Obtain approval to operate a UAS on university property or at university sponsored events prior to doing so. All requests must be forwarded to osurisk@osu.edu at least <u>three weeks</u> in advance. 2. Sign a written hold harmless agreement and attest to the minimum amount of insurance coverage specified in the policy. 3. Do not operate a UAS unless approval has been granted. 4. Follow all federal, state, local, and university requirements governing UAS. 5. Observe and practice all specified safety precautions. 6. Do not monitor or record activities where there is a reasonable expectation of privacy. 7. Do not record or observe areas such as camps or campus settings where minors are cared for or taught unless prior approval is granted by the UAS Advisory Committee. 8. Do not use a UAS for any unlawful purpose.



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Resources

Export Review Request Form, [http://oaa.osu.edu/assets/files/Service Center/Forms/Fiscal/UAS/Export-Review-Request-Form.pdf](http://oaa.osu.edu/assets/files/Service%20Center/Forms/Fiscal/UAS/Export-Review-Request-Form.pdf)

FAA Section 333, faa.gov/uas/legislative_programs/section_333/

FAA Model Aircraft rules, faa.gov/uas/media/model_aircraft_spec_rule.pdf

UAS Request Form, oaa.osu.edu/assets/files/Service%20Center/Forms/Fiscal/UAS/UAS-Request-Form.pdf

UAS Hold Harmless Agreement, oaa.osu.edu/assets/files/Service%20Center/Forms/Fiscal/UAS/UAS-Hold-Harmless-agreement.pdf

UAS FAQ, go.osu.edu/uas-faq

The Ohio State University Code of Student Conduct, studentaffairs.osu.edu/csc/

University Rule 3335-5-04, trustees.osu.edu/rules/university-rules/chapter-3335-5-faculty-governance-and-committees.html

Export Control policy, orc.osu.edu/files/2011/01/ExportControlPolicy.pdf

Contacts

Subject	Office	Telephone	E-mail/URL
Policy interpretation, general inquiries	Office of Academic Affairs	614-292-5881	uasystems@osu.edu
Requests to operate UAS	Office of Risk Management		osurisk@osu.edu

History

Issued: 11/20/2015 as Interim

Edited: 12/22/2015