



Applies to: Faculty, staff, students, volunteers, vendors, and all visitors (invited guests and the general public) who seek to: 1) operate a UAS on any university property; 2) operate a UAS at any university-sponsored event or activity; or 3) use a UAS acquired with university resources.

Responsible Office

Office of Academic Affairs

POLICY

Issued: 11/20/2015
Revised: 11/15/2017

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 university property, at any university-sponsored event or activity, or use UAS acquired with university resources must receive advance approval in accordance with this policy and comply with all restrictions or conditions set by the university and all applicable laws.

Purpose of the Policy

To mitigate risks to individuals and organizations potentially affected by UAS activities. To ensure compliance with federal, state, and local laws; applicable university policies; contract provisions; and referenced guidance. To enable teaching and scholarship.

Definitions

Term	Definition
Accident	Any incident that causes damage to persons or property.
Adverse event	Any incidents that include near misses, non-damage collision incidents, etc.
Emergency	An urgent situation where action is taken to promote the safety and security of persons and/or property.
Favorable conditions	A situation under which no adverse weather hazards or other environmental factors will affect the safe operation of an approved UAS flight.
Invited guest(s)	Individuals or entities who visit university property, by invitation of a faculty member, staff member, or registered student organization for some purpose that benefits The Ohio State University. Examples include but are not limited to contractors, consultants, donors, visiting scholars, foreign dignitaries, or speakers.
General public	Individuals or entities who visit university property for their own benefit or pleasure, and are not invited guests. Examples include but are not limited to local residents, university personnel or students flying a personally-owned UAS for recreational/hobbyist purposes.
Foreign person	Any person who is not a U.S. citizen, is not a lawful permanent resident of the U.S., or does not have refugee or asylum status in the U.S.
Model aircraft	A subset of UAS which (1) is flown only for hobby or recreational purposes, per section 336(c) of the FAA Modernization and Reform Act of 2012; (2) is capable of sustained flight in the atmosphere; (3) is flown within direct line of sight of the aircraft operator; (4) must not exceed a gross weight of 55 pounds at the time of operation, including the weight of any payload and fuel; and (5) is appropriately registered and marked prior to any flight operation, if required by the FAA.
Operator	The individual who exercises authority over initiating, conducting, or terminating a flight of a UAS.
Part 107	Provided for under 14 C.F.R. Part 107, this section sets forth FAA requirements for small UAS operations, not including model aircraft. Operations under Part 107 must be conducted following the requirements specified in Part 107, including but not limited to, possession of the appropriate FAA remote pilot certification.



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Term	Definition
Certificate of waiver	A document provided by FAA evidencing its waiver of certain specific federal operational limitations or requirements.
Public Use COA	An authorization granted to a public agency or organization to operate a specific aircraft for a specific purpose in a specific location. It is only issued after the process of determining an entity's public status, government use, and an operational and technical review.
Locations where there is a reasonable expectation of privacy	Locations where there is an objective expectation of privacy. Examples include but are not limited to restrooms, locker rooms, student housing, hotel rooms, and health treatment and medical facilities.
Restricted areas	Areas on university property designated by university personnel from time to time and from which UAS may not be operated.
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, bike paths, regional campuses, and other university property outside of Columbus.
University-sponsored event or activity	Any university-sanctioned, -hosted, or -affiliated event or activity, whether or not it occurs on university property. This includes but is not limited to: student meetings, athletic events, university promotional gatherings, research activities and/or flights, or other use of university-owned, -leased, or -used UAS.
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, sensors, sprayers or other dispersal devices, and navigational equipment. FAA regulations apply to all types of UAS regardless of weight or size. Unless otherwise specified, use of model aircraft, a subset of UAS, should follow the procedures for all UAS in this policy.

Policy Details

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- I. Requests for **Unmanned Aircraft Systems (UAS)** activities will be processed consistent with applicable federal, state, and local laws; applicable university policies; contract provisions; and referenced guidance.
- II. Operation of any UAS on any **university property** or at any **university-sponsored event or activity**, or using UAS acquired with university resources, is prohibited unless first approved by the UAS Advisory Committee.
- III. The acquisition of UAS by university units or individuals must be completed pursuant to applicable university policies, including the [Purchasing](#) policy and the [Export Control](#) policy.
- IV. The export (i.e., transfer and use, even domestic) of UAS by university units or individuals is controlled under United States export regulations.
 - A. In the absence of an export license or other governmental authorization, certain controlled systems cannot be:
 1. Exported to **foreign persons**;
 2. Used by foreign persons; or
 3. Used in certain sanctioned countries.
 - B. All UAS operations must be in accordance with applicable export regulations and the [Export Control](#) policy.
- V. UAS owned, leased, or used by The Ohio State University must be operated under appropriate FAA authorization based on the purpose for the flight. This authorization will outline the conditions, parameters, and limitations of UAS flight operations.
 - A. Those operating UAS must also review and be aware of all FAA specifications and file for any necessary amendments or **certificates of waiver** in advance of UAS operations.
 - B. **Operators** must be able to identify the applicable FAA authorization for their operation of UAS owned, leased, or used by The Ohio State University.
- VI. Operators of all UAS must follow all FAA regulations; federal, state, and local laws; applicable university policies; contract provisions; and referenced guidance in advance of, during, and after any UAS activities.



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- A. These requirements include but are not limited to FAA airmen certificate requirements, conditions of any airworthiness certificates or certificates of waiver, state law governing the safe operation of aircraft, and university policies regarding access to campus.
 - B. Individuals who operate UAS in violation of any FAA regulations; federal, state, and local laws; applicable university policies; contract provisions; and referenced guidance may be directed by authorized university personnel to cease operation of the UAS immediately until approval is obtained and the UAS may be confiscated by authorized university personnel. Violations will be referred to the applicable university disciplinary process and will be considered in the review of future UAS requests.
 - C. The FAA may issue Temporary Flight Restrictions over university property or at any university-sponsored event or activity (e.g., university sporting events), which will prohibit any type of UAS operations from taking place. As needed, the university may establish additional **restricted areas** on university property or at any university-sponsored event or activity, from which UAS operations would be prohibited.
- VII. The UAS Advisory Committee reviews, assesses, approves, and provides guidance for UAS activities on university property or at any university-sponsored event or activity, or using UAS acquired with university resources.
- A. The committee will:
 - 1. At its reasonable discretion, approve or defer UAS requests.
 - 2. Grant any exceptions to this policy as necessary.
 - 3. Identify and confirm any FAA Temporary Flight Restrictions or university- restricted areas.
 - B. The committee will consult with content experts as needed.
 - C. The committee will include representation from the Offices of Academic Affairs, Environmental Health and Safety, Research, Research Compliance, Risk Management, and Student Life, as well as the College of Food, Agriculture, and Environmental Science; Department of Public Safety; Facilities Operations and Development; University Communications; the Wexner Medical Center; and at least one additional faculty representative.
 - D. Depending on the intended use and the activities associated with the use of the UAS, other university approvals may be required (e.g., communications, trademark and licensing) before operating a UAS on university property or at university-sponsored events or activities.
 - E. 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 or activities that do not occur on university property for UAS flights.
- VIII. UAS must not be used for unapproved monitoring, recording, or observing any campus event, activity, or performance.
- A. UAS may not be used to monitor, record, or observe (e.g., stream, broadcast, photograph) areas or activities in **locations where there is a reasonable expectation of privacy** pursuant to state and federal law or to make unapproved recordings of any campus events, etc.
 - B. Using a UAS to monitor, 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.
- IX. The operation of UAS by the Department of Public Safety and/or the university Emergency Operations Center 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.

PROCEDURE

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- I. Obtaining Approval for UAS Operations
 - A. Operating a UAS on university property (including regional campuses and other university property outside Columbus) requires submission of a completed [UAS Request Form](#) as early as possible.
 - B. Operating a UAS owned, leased, or used by the university not on university property (i.e., UAS operated at university-sponsored events or activities off university property, domestic or international) requires:



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1. Submission of a completed [UAS Request Form](#) for approval at least two weeks prior to the intended flight date(s);
 2. Following any laws and regulations governing the operation of UAS applicable to the jurisdiction (e.g., other states or countries); and
 3. Notifying the property owner as applicable if accessing another's property to operate the UAS.
- C. Operating a UAS owned, leased, or used by the university or using a UAS operated pursuant to formal authorization granted by the FAA to The Ohio State University (e.g., under the university's **Public Use COA**, or other FAA permissions), but not on university property and not at a university-sponsored event or activity, requires contacting the Office of Risk Management prior to seeking approval to operate a UAS under Procedure I.A or I.B of this policy.
- II. UAS Operations Involving Export Controlled UAS Equipment or Technology
- A. Notwithstanding any other sections of the policy, as detailed in Policy Details III and IV, individuals seeking to acquire, transfer, use, and/or modify controlled UAS equipment or technology must complete and submit an [Export Review Form](#) pursuant to the [Export Control](#) policy.
 - B. Please note that controlled equipment must undergo an export review which may require a longer evaluation period.
 - C. The export review must be done prior to obtaining approval to operate a UAS under Procedure I.
- III. Review and Approval of UAS Request Forms
- A. Upon receipt of the completed UAS Request Form, the Office of Risk Management will conduct an initial suitability assessment and route the request and accompanying documentation to the UAS Advisory Committee for review.
 - B. The UAS Advisory Committee may request additional information or clarification from the requestor, and may provide direction or other requirements for the UAS operation to take place prior to approval.
 - C. The UAS Advisory Committee will notify the requestor of a decision prior to the intended flight date(s) by way of response on the UAS Request Form.
 - D. A record of the decisions of the UAS Advisory Committee will be maintained consistent with the [General Records Retention Schedule](#).
- IV. Operation of UAS
- A. A copy of the approved UAS Request Form will be provided to the operator who must be in possession of the Request Form at all times during UAS activity, and must be presented to any university official or representative with control or jurisdiction over the area or activity upon request.
 - B. Operators must only conduct approved flights under **favorable conditions** and follow all FAA regulations during flight and any applicable Temporary Flight Restrictions or No Drone Zones.
 - C. If unforeseen or exigent circumstances develop (e.g., adverse weather, mechanical issues, public safety issues), or if operations cannot be conducted consistent with the requirements of applicable laws and/or policies, the operator must postpone the flight until favorable conditions are achieved.
 1. The requestor may seek an extension from osurisk@osu.edu within three business days of the original approved flight date(s).
 2. If the requestor does not request an extension within three business days, the requestor must reapply pursuant to Procedure I.
 - D. **Model aircraft** can be operated only for hobby or recreational purposes, or by students for educational purposes in connection with a class for credit, and not for any business purpose.
- V. Accident and Adverse Event Reporting
- A. **Accidents** involving a UAS operated on university property:
 1. Must be reported immediately to The Ohio State University Police Division (OSUPD) or the appropriate law enforcement agency.
 2. Must be reported to osurisk@osu.edu as soon as possible.
 - a. OSUPD jurisdiction: OSUPD will forward a copy of the report to osurisk@osu.edu as soon as possible.



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b. Non-OSUPD jurisdiction: The university will initiate a records request with the law enforcement agency to obtain a copy of the report.

3. Must be reported to the FAA as required pursuant to the type of flight authorization received from the FAA (e.g., if flying under **Part 107**, reporting should adhere to 14 C.F.R. §107.9).

B. Accidents involving a UAS owned, leased, or used by the university, or accidents involving a UAS operated pursuant to formal authorization granted by the FAA to The Ohio State University and not operated on university property:

1. Must be reported to the appropriate regulatory agency (e.g., FAA or other state or country’s regulatory agency) as applicable and to any appropriate law enforcement agency.

2. Must be reported to osurisk@osu.edu as soon as possible.

a. The university will initiate a records request with the law enforcement agency to obtain a copy of the report.

C. Any **adverse event**, regardless of location, must be reported by the operator to osurisk@osu.edu as soon as possible with a description of the adverse event. Upon request, an operator must assist university personnel with any analysis, investigation, and/or remediation effort requested following an accident or adverse event.

VI. Accountability

A. Individuals violating this policy may be subject to legal or disciplinary action applicable to their status, 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 the [Faculty Rule 3335-5-04](#).

B. Owners and/or operators may be responsible for any property damage, losses, costs, or other expenses resulting from the operation of UAS.

C. Operators are responsible for fulfilling any reporting obligations under federal, state, or local laws before, during, or after UAS operations.

D. Any operator found to be operating in an unsafe manner may be prohibited from additional flights on university property or at university-sponsored events or activities.

Responsibilities

Position or Office	Responsibilities
Office of Academic Affairs	<ol style="list-style-type: none"> Assist with processing requests for UAS activities consistent with applicable laws, regulations, and university policies. Provide policy interpretation and respond to general inquiries regarding UAS activities.
Office of Risk Management	<ol style="list-style-type: none"> Assist with processing requests to operate a UAS. Conduct an initial suitability assessment. Route requests to the UAS Advisory Committee. Maintain a record of UAS Advisory Committee decisions. Receive incident/accident reports.
UAS Advisory Committee	<ol style="list-style-type: none"> Review requests for operation of UAS on university property or at university-sponsored events or activities and approve or defer such requests. Request additional information as needed and provide direction to requestors regarding requirements. Notify requestors of decisions within ten working days of receipt of request. Grant any exceptions to this policy. Confirm Temporary Flight Restrictions (TFR) or restricted areas as applicable.
Operators	<ol style="list-style-type: none"> Obtain approval to operate a UAS on university property or at university-sponsored events or activities prior to operation. Submit completed UAS Request Forms two or three weeks in advance, as applicable. If applicable, sign an Unmanned Aircraft Operations Agreement and attest to the minimum amount of insurance coverage specified in the policy.



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Position or Office	Responsibilities
	4. If applicable, complete and submit an Export Review Form as specified in the policy. 5. Obtain any additional approvals (e.g., for videography, photography, and recording). 6. Observe and practice all specified safety precautions. 7. Follow all laws, regulations, and university policies governing UAS before, during, and after UAS activities. 8. Report accidents in OSUPD jurisdiction immediately to The Ohio State University Police Division. 9. Report accidents outside OSUPD jurisdiction and all adverse events as soon as possible to osurisk@osu.edu .
Office of Research Compliance	Conduct export reviews prior to the UAS Advisory Committee processing any UAS request forms.
Office of Legal Affairs	Coordinate with the Department of Public Safety and local law enforcement for any university-sponsored events or activities that do not occur on university property.
Department of Public Safety	Coordinate with Office of Legal Affairs and local law enforcement for any university-sponsored events or activities that do not occur on university property.
Ohio State University Police Division	Forward all police reports of UAS-involved accidents as soon as possible to osurisk@osu.edu .

Resources

Forms

- UAS Request Form, oaa.osu.edu/assets/files/Service%20Center/Forms/Fiscal/UAS/UAS-Request-Form.pdf
- Unmanned Aircraft Operations Agreement, oaa.osu.edu/assets/files/Service%20Center/Forms/Fiscal/UAS/UAS-Hold-Harmless-agreement.pdf
- Export Review Form, oaa.osu.edu/assets/files/Service%20Center/Forms/Fiscal/UAS/Export-Review-Request-Form.pdf

University policies and rules

- 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/ExportControlPolicy.pdf
- General Records Retention Schedule, library.osu.edu/projects-initiatives/osu-records-management/retention-schedules
- Purchasing policy, 2.21, busfin.osu.edu/FileStore/PDFs/221_Purchasing.pdf

Additional Guidance

- UAS FAQ, go.osu.edu/uas-faq
- FAA Unmanned Aircraft Systems Website, faa.gov/uas/
- FAA Section 333, faa.gov/uas/beyond_the_basics/section_333/
- FAA Model Aircraft rules, faa.gov/uas/media/model_aircraft_spec_rule.pdf
- FAA Part 107 Regulations Fact Sheet, faa.gov/news/fact_sheets/news_story.cfm?newsId=20516

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
Export control questions	Office of Research Compliance	614-688-1596	exportcontrol@osu.edu
To request UAS activity with videography, photography, or recording	University Communications	----	ucom.osu.edu
To request UAS activity with videography, photography, or recording	Trademark and Licensing Services	614-292-1562	trademarklicensing.osu.edu



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History

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