



Unmanned Aircraft System (Drone) Policy

Responsible Officer:	Chief Risk Officer
Responsible Office:	RK - Risk / EH&S
Issuance Date:	February 9, 2018
Effective Date:	February 9, 2018
Last Review Date:	New Policy
Scope:	Policy covers all University-owned Unmanned Aircraft Systems, all Unmanned Aircraft Systems used for University Business and all persons at University Locations operating Unmanned Aircraft Systems.

Contact:	Ken Smith
Title:	EHS Executive Director
Email:	Ken.Smith@ucop.edu
Phone:	(510) 987-0170

TABLE OF CONTENTS

I. POLICY SUMMARY	1
II. DEFINITIONS.....	2
III. POLICY TEXT	3
IV. COMPLIANCE/RESPONSIBILITIES.....	4
V. PROCEDURES	6
VI. RELATED INFORMATION	8
VII. FREQUENTLY ASKED QUESTIONS	8
VIII. REVISION HISTORY	8

I. POLICY SUMMARY

The purpose of this Unmanned Aircraft System (UAS) Policy (Policy) is to establish University oversight and minimum record-keeping requirements for UAS, commonly known as drones and includes Small Unmanned Aircraft Systems (SUAS) and model aircraft.

This Policy requires that all UAS operations are performed in a manner that mitigates risks to safety, security, and privacy, and ensures compliance with all applicable laws.

This includes, but is not limited to regulations regarding US domestic airspace, international airspace, aircraft registration, and state or other local regulations.

II. DEFINITIONS

Designated Local Authority – A single-point of contact or committee appointed by the Executive Officers or their designee at an individual University Location to oversee the development, implementation, and enforcement of any University Location-specific UAS related policies and procedures.

Executive Officer – The term “Executive Officer” means any of the University of California’s Chancellors, Medical Center Chief Executive Officers, Director of Lawrence Berkeley National Laboratory, and Vice President for Agriculture and Natural Resources.

Federal Aviation Administration (FAA) – A division of the Department of Transportation that inspects and rates civilian aircraft and pilots, enforces the rules of air safety, and installs and maintains air-navigation and traffic-control facilities.

Model Aircraft – The term “model aircraft” means an unmanned aircraft that is capable of sustained flight in the atmosphere, flown within visual line of sight of the person operating the aircraft, and flown for hobby or recreational purposes.

Recreational Use – The term “recreational use” or its derivatives, means operations conducted strictly for hobby or recreational purpose. Flights that are commercial in nature, are in furtherance of a business, or incidental to a person’s business, regardless of compensation, are not considered “recreational.”

Small Unmanned Aircraft System (SUAS) – The term “small unmanned aircraft system” means an unmanned aircraft weighing less than 55 lbs. and associated elements that are required to operate safely and efficiently in the national airspace system.

Systemwide Designated UAS Authority – The individual designated by the UCOP EH&S Executive Director as authorized to provide oversight for Unmanned Aircraft Systems.

University Business – The term “University Business” means the official activities of a University that contribute to any one of the University’s major functions of teaching, research, patient care, or public service, or to any other non-recreational University purpose.

University Location – The term “University Location” means any property or building that is owned or leased by the University where University Business or activities take place.

University Location Address – The term “University Location Address” means the address which shall appear on the ownership and registration documents for all UAS owned by that University Location.

Unmanned Aircraft System (UAS) – The term “unmanned aircraft system” means an unmanned aircraft and associated elements (including communication links and the components that control the unmanned aircraft) that are required for the pilot in command to operate safely and efficiently in the national airspace system.

III. POLICY TEXT

The University recognizes that UAS and SUAS offer great potential as tools for research and other educational functions as well as providing opportunities for recreational use and business pursuits across a diverse array of users and industries. The University also has an obligation to consider public safety, privacy, civil rights, and civil liberties issues related to the use of UAS.

This Policy establishes a Systemwide Designated UAS Authority and a UAS Advisory Board to provide oversight of the use of UAS and to develop and implement policies and guidance for the use of UAS. Executive Officers may assign a Designated Local Authority and authorize the development and implementation of location-specific policies or procedures at any University Location within the Executive Officer’s jurisdiction. A Designated Local Authority may be authorized to provide oversight at a University Location.

It is the policy of the University that anyone who seeks to operate a University-owned UAS, a UAS for University Business or on a University Location must comply with the following:

- Have approval from the appropriate aviation agency and operate in compliance with all applicable regulations and rulings.
- Receive approval in advance from the Designated Local Authority at a specific University Location or Systemwide Designated UAS Authority.
- Operate in a manner that ensures public safety, right to privacy, civil rights and civil liberties.
- Maintain sufficient liability insurance coverage.

A University Location-specific policy or procedure may further define an approval process or processes that addresses recurrent, standing, conditional or other forms of approval that constitute written approval. Additional conditions or restrictions may be agreed upon and attached to the approval. A University Location-specific policy or procedure may additionally further define UAS activity reporting requirements.

Some exceptions from the provisions in this Policy may be made on a case-by-case basis after review and approval by the UAS Advisory Board, which shall consider and balance relevant factors such as human health and safety, environmental concerns, privacy, the purpose of the proposed UAS activity, and operator experience. The justification for any such exceptions shall be documented in writing by the UAS Advisory Board.

IV. COMPLIANCE/RESPONSIBILITIES

The goal of this Policy is to ensure that all UAS activities are conducted in a manner that ensures the protection of students, faculty, staff, visitors, the public, property, and the environment and complies with all applicable laws and regulations.

The following individuals have the particular responsibilities for implementing the principles and practices of this Policy.

A. Executive Officers or their designees are responsible for:

- Communicating the University's commitment to individual's rights safety, privacy, civil rights, and civil liberties.
- Oversight of the interpretation and effective implementation of this Policy at University Locations within their jurisdiction.
- Adopting procedures to ensure implementation of this UAS Policy.
- Authorizing the development and implementation of University Location-specific UAS policies and procedures, as applicable.
- Assigning a Designated Local Authority as a point of contact who is responsible for developing, implementing, and enforcing University Location-specific requirements, as applicable.

B. The University of California Office of the President (UCOP) Environment, Health & Safety (EH&S) Executive Director is responsible for:

- Providing Policy interpretation and responding to general inquiries regarding UAS activities.
- Enforcing the provisions of this Policy.
- Assigning a Systemwide Designated UAS Authority.
- Maintaining records of the results and decisions of the Systemwide Designated UAS Authority.
- Making UAS records publically available as appropriate.
- Appointing members to the UAS Advisory Board.

C. The Systemwide Designated UAS Authority is responsible for:

- Providing UAS regulatory interpretation and assistance with compliance.
- Ensuring Policy compliance with applicable laws and regulations.
- Providing assistance with requests for UAS activities consistent with applicable laws and regulations and Policy requirements, unless a Designated Local Authority has been selected and delegated this task for specific University Locations.
- Providing support in communication with regulatory authorities, and when appropriate, acting on behalf of University faculty and staff as a point of

University of California – Policy
Unmanned Aircraft System (Drone) Policy

contact to the applicable aviation authority for UAS registration and flight operations.

- Providing a central repository for all applicable regulations and policies, including international, federal, state and local regulations, and University Location-specific policies and other agency policies, as appropriate.
- Maintaining a record of UAS activity covered under this Policy.
- Implementing effective mechanisms for reporting in order to remain in compliance with applicable laws and policies.
- Providing a forum to communicate and share UAS-related information and best practices.
- Coordinating the development of University UAS policies through task forces/working groups.

D. The UAS Advisory Board is responsible for:

- Reviewing exceptions from this Policy on a case-by-case basis, subject to the requirements in Section III, above.
- Assisting in the development of systemwide UAS policies.
- Reviewing and commenting on proposed policies and long-term goals.
- Evaluating the effectiveness of systemwide UAS policies and safety metrics.
- Ensuring that systemwide UAS policies remain consistent with applicable privacy best practices.

E. A Designated Local Authority (if assigned by an Executive Officer or his/her designee) is responsible for:

- Developing University Location-specific UAS policies or procedures that meet or exceed the requirements of this Policy.
- Providing assistance with requests for UAS activities consistent with applicable laws and regulations and University Location-specific policies or procedures.
- Reviewing and approving applications for operation of UAS within the Designated Local Authority's jurisdiction.
- Notifying the applicant if the flight authorization request is approved, denied, or if the flight authorization request will require further information or appropriate aviation agency authorization.
- Maintaining a record of approval requests and decisions, which shall be submitted to the Systemwide Designated UAS Authority upon request.
- Maintaining a record of all UAS flights at University Locations within the Designated Local Authority's jurisdiction, which record shall be submitted to the Systemwide Designated UAS Authority upon request.

F. Operators of UAS are responsible for:

- Requesting and obtaining all proper approvals prior to operating a UAS at any University Location or for any University Business.
- Following the requirements of this Policy and all applicable laws and regulations.
- Maintaining a safe UAS operating environment.
- Following applicable University UAS privacy best practices.
- Reporting UAS activity to the Designated Local Authority or Systemwide Designated UAS Authority.
- Immediately reporting any accident that results in injury or property damage to the Designated Local Authority or Systemwide Designated UAS Authority.

V. PROCEDURES

This Policy sets minimum systemwide requirements for operating UAS. The requirements below must be followed at all University Locations. Individual campuses, medical centers, Agriculture and Natural Resources locations, and Lawrence Berkeley National Laboratory, through their respective Designated Local Authorities, may also develop policies and procedures as long as they meet or exceed the requirements of this Policy.

The operation of UAS by emergency first responders may be exempt from this Policy based on determination of emergency needs. During such operations, the emergency responders will follow their internal department protocols.

A. General Procedures

- All persons seeking to operate a University-Owned UAS, a UAS for University Business, or at University Locations must first submit a completed UAS Request Form to the Designated Local Authority or Systemwide Designated UAS Authority in advance of any UAS activity.
- The Designated Local Authority or Systemwide Designated UAS Authority will review and process the request and notify the applicant if the request is approved, denied, or will require further information no later than two weeks after submission of an application.
- The request must be reviewed for
 - Compliance with applicable regulations and policies
 - Impacts to public safety
 - Impacts to privacy
 - Impacts to civil rights and civil liberties
 - Compliance with insurance requirements

University of California – Policy
Unmanned Aircraft System (Drone) Policy

- Once approved, the operator must follow the requirements of this Policy, any conditions required by the approval, and all applicable laws and regulations.
- A copy of the approval must be in the possession of the operator at all times during the activity and, upon request, must be presented to any University official or representative with jurisdiction over the activity.
- The operator must follow University privacy best practices at all times, including, but not limited to:
 - UAS may not be used to monitor or record activities where there is a reasonable expectation of privacy.
 - UAS must not be used for unapproved recordings of any campus events or performances, or for any unlawful purpose.
- The operator must provide a post-flight report of UAS activity to the Designated Local Authority or Systemwide Designated UAS Authority as soon as possible.
 - Any accident that results in injury or property damage must be reported immediately.

B. Registration of UAS

- All UC-owned UAS must be registered in accordance with all applicable laws, regulations, and requirements.
- Registration documents for UC-owned UAS must be submitted to the Designated Local Authority or Systemwide Designated UAS Authority and must reflect the following ownership data:

The Regents of the University of California
(University Location Address)
- Registration documents for all UAS used for University Business must be submitted to the Designated Local Authority or Systemwide Designated UAS Authority.

C. Liability Insurance

- All UAS activity covered under this Policy must have aviation liability coverage.
- Any 3rd Party or Non-University Business UAS activity must additionally include a written agreement that indemnifies and holds the University harmless from any claims or harm to individuals, damage to University property, and any other claims, liabilities, and potential penalties.
- Recreational users, at the discretion of the Designated Local Authority, may be exempt from the liability insurance requirement if the Designated Local Authority determines that the proposed recreational use poses no risk to the

University of California – Policy
Unmanned Aircraft System (Drone) Policy

health and safety of persons, property, or the environment and that the cost of liability insurance would pose an undue hardship to the recreational user.

D. Export Control

- All UAS activity for University Business in foreign nations or by foreign nationals must follow export control regulations and the UC Export Control Policy.
- All UAS activity involving the export of a UAS internationally or use of an export-controlled UAS must be reviewed by the appropriate export control officer.

VI. RELATED INFORMATION

[FAA Website on Unmanned Aircraft Systems \(US Specific\):](#)

<https://www.faa.gov/UAS/>

[FAA Model Aircraft rules:](#)

www.faa.gov/uas/media/model_aircraft_spec_rule.pdf

[UC UAS Website:](#)

<http://ucop.edu/enterprise-risk-management/resources/centers-of-excellence/unmanned-aircraft-systems-safety.html>

[UC UAS Policy Guidance Document:](#)

http://ucop.edu/enterprise-risk-management/_files/uas/uas-policy-guidance-document.pdf

[UC UAS Request Form](#) (found on or made available by Designated Local Authority):

<http://ucop.edu/enterprise-risk-management/resources/centers-of-excellence/unmanned-aircraft-systems-safety.html>

[UC UAS Privacy Best Practice:](#)

<http://www.ucop.edu/enterprise-risk-management/resources/centers-of-excellence/unmanned-aircraft-systems-safety.html>

VII. FREQUENTLY ASKED QUESTIONS

An updated list of [Frequently Asked Questions](#) can be found at:

<http://ucop.edu/enterprise-risk-management/resources/centers-of-excellence/unmanned-aircraft-systems-safety.html>

VIII. REVISION HISTORY

This is a new policy and meets the Web Content Accessibility Guidelines (WCAG) 2.0.