



Unmanned Aircraft Systems (Drone) Policy

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Policy Statement

Out of safety concerns for students, employees, guests, neighbors and University property, the University of San Francisco (“University”) prohibits the operation of unmanned aircraft systems (UAS), or aerial drones, on campus by the general public, including recreational users and hobbyists, without prior written authorization from the University.

This prohibition includes drones for filming or videotaping, as well as any drone use by media or journalists operating above University of San Francisco property, including any drone launched off site and subsequently flown above University property.

Any university employee, student, or third party who seeks to operate a UAS on or above University property or at a University-sponsored event must obtain advance approval from the University’s Department of Public Safety and Department of Risk Management. Any operation that is not approved in advance is prohibited.

First responders and other organizations responding to natural disasters or other emergency situations may be eligible to fly on campus without prior authorization from the University via the Special Government Interest (SGI) amendment process (FAA Order JO 7200.23A.). Such emergency situations may include firefighting, search and rescue, law enforcement, utility or other critical infrastructure restoration, incident

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awareness and analysis, damage assessments supporting disaster recovery related insurance claims, and media coverage providing crucial information to the public.

The operation of unmanned aircraft systems, including drones and model aircrafts will be governed by the Federal Aviation Administration (FAA) rules and regulations and relevant state law. The University of San Francisco will establish procedures required to ensure compliance with those legal obligations and to reduce risks to safety, security and privacy. Procedures may include certification, training, insurance coverage, and indemnification requirements.

Any violation of this policy will be referred to the University of San Francisco Department of Public Safety, Risk Management, General Counsel, or Student Life (if involving a student) for possible legal action and/or suspension.

Scope

This Policy applies to:

- The operation by any person of unmanned aircraft systems on or above University property;
- The purchase of unmanned aircraft systems with funding through the University, and;
- The hiring for, or contracting for any unmanned aircraft services by a University department.

Flying a Drone- Requirements and Procedures

For USF Faculty and Staff:

For faculty/staff that will be flying a university-owned, professor-owned, or personal drone for educational purposes:

1. Review and learn what is and what is not allowed under [Part 107 rules](#).
2. Complete the process to become an [FAA-Certified Drone Pilot](#) by passing the [Knowledge Test](#).
3. [Register your drone](#) with the FAA if it weighs more than .55lbs.
4. After registration is completed, [mark your drone](#) with the registration.
5. Fill out [Request for Drone Use Form](#) and send to the Department of Risk Management.

For USF Students:

For students that will be flying a university-owned, professor-owned, or personal drone for educational purposes:

1. Review and learn what is and what is not allowed under [Part 107 rules](#).
2. Learn the regulations on [where you can fly](#).
3. If you will be flying a personal drone for an educational purpose, [register your drone](#) with the FAA and [mark your drone](#) with the registration.
4. Fill out [Request for Drone Use Form](#) and send to the Department of Risk Management, unless USF faculty/staff has already filled out the form for the educational purpose in which the student will be flying the drone.

Purchase of Drone by USF Employee, Student, or Department for educational purposes:

Any University employee, student, or department wishing to purchase a UAS (or the parts to assemble a UAS), or UAS services with University funds, or funds being disbursed through a university account, or grant funds, must contact the Department of Risk Management beforehand in order to assess the University's ability to obtain a COA, other necessary FAA exemptions, comply with any revisions to FAA requirements, or meet local compliance requirements.

For Third Parties:

For third parties that will be flying their own drone.

1. Pilot Requirements

- a. Must have [Remote Pilot Airman Certificate](#)
- b. Must be 16 years old
- c. Must pass TSA vetting
- d. *A person who already holds a pilot certificate issued under [14 CFR part 61](#) and has successfully completed a flight review within the previous 24 months can complete the [part 107 online training](#) course to satisfy the Remote Pilot Airman requirement*
- e. Must be in physical and mental condition to safely fly a drone
- f. Must be able to read, write, and understand English

2. Aircraft Requirements

- a. Must be less than 55 lbs.
- b. Must be registered if over 0.55 lbs online. [Register the Drone](#)

3. Location Requirements

- a. Must be operated in Class G Airspace*
- b. Must be operated within the University Property lines outlined in the [University Drone Map](#)

4. Operating Rules - Title 14 of the Code of Federal Regulation ([14 CFR Part 107](#))

- a. Must undergo pre-flight check to ensure UAS is in condition for safe operation
- b. Must keep the aircraft in sight (visual line-of-sight)*
- c. Must fly under 400 feet above ground level or, if higher structure than 400 feet, remain within 400 feet of the structure *
- d. Must fly during the day*
- e. Must fly at or below 100 mph*
- f. Must yield right of way to manned aircraft*
- g. Must NOT fly over people*
- h. Must NOT fly from a moving vehicle*
- i. Must not fly under a covered structure that is considered to be outdoors such as parking structures or awnings
- j. Never fly over stadiums, sporting events, or any University function where crowds are gathered, unless approved specifically for the event
- k. Never fly under the influence of alcohol, drugs, or any controlled or uncontrolled substance impairing motor/cognitive skills

5. * **Certificate of Authorization (COA):** The Department of Risk Management is the FAA / Certificate of Authorization account holder for the University and will review all requests for a waiver/s of requirement/s on a case-by-case basis.

6. **University requirements:** Any third party wishing to operate a UAS or model aircraft on or over University property must first receive approval through the Department of Public Safety and the Department of Risk Management. Third parties seeking approval to operate a UAS on or over University property must first:
 - a. Provide proof of FAA approval to operate the UAS;
 - b. Agree to indemnify and hold the University harmless from any resulting claims resulting from the use, including but not limited to claims for personal injury, as well as damage to property of the University, its employees, agents, invitees and third parties; and
 - c. Provide proof of insurance in amounts and forms deemed acceptable in the [Insurance Requirements](#) section below by the Department of Risk Management and;
 - d. Fill out a Request [for Drone Use Form](#) and send to the Department of Risk Management.



Pilot Airman License to Fly a Drone

A remote pilot in command of a drone must comply with these FAA Requirements:

- Make available to the FAA, upon request, the small UAS for inspection or testing, and any associated documents/records required to be kept under the rule.
- Conduct a preflight inspection, to include specific aircraft and control station systems checks, to ensure the small UAS is in a condition for safe operation.
- Ensure that the small unmanned aircraft complies with the existing registration requirements specified in § 91.203(a)(2). (The FAA now requires every drone owner to register a UAS over .55 lbs.)

3rd Party/Commercial Insurance Requirements

For third parties utilizing a UAS on or above University Property, Owner/Operator shall procure and maintain for the duration of the contract insurance against claims for injuries to persons or damage to property which may arise from or in connection with the ownership, maintenance or use of the Unmanned Aircraft System. The certificate of insurance must be presented and approved by the Department of Risk Management.

Minimum Scope and limit of Insurance: Coverage shall be at least as broad as:

Aviation Liability Insurance - on an “occurrence” basis, including products and completed operations, property damage, bodily injury with limits no less than \$1,000,000 per occurrence, and \$2,000,000 in the aggregate. This coverage may also be provided by endorsement to a **Commercial General Liability** policy. In that event then:

- ❖ **Commercial General Liability (CGL):** Insurance Services Office Form CG 00 01 covering CGL on an “occurrence” basis, including products and completed operations, property damage, bodily injury and personal & advertising injury with limits no less than \$2,000,000 per occurrence. If a general aggregate limit applies, either the general aggregate limit shall apply separately to this project/location (ISO CG 25 03 or 25 04) or the general aggregate limit shall be twice the required occurrence limit.

Workers’ Compensation Insurance - as required by the State of California, with Statutory Limits, and Employer’s Liability Insurance with a limit of no less than \$1,000,000 per accident for bodily injury or disease.

RATING: Coverage must be placed with an insurance company with an AM Best rating of A VII or equivalent unless otherwise agreed to by the University.

DESCRIPTION OF OPERATIONS: The COI must show specific information as to the date(s) and event for which the drone is being issued.

ADDITIONAL INSURED ENDORSEMENT FORM: Accompanying the COI must be a separate endorsement to the policy naming: “The University of San Francisco, its trustees, officers, employees, faculty, and agents are included as an Additional Insured as their interests may appear with regard to the activity and/or operations under the subject Contract or Agreement” except for workers’ compensation insurance. The endorsement must show the policy number stated on the COI.

CANCELLATION: Be in compliance with the latest revised Acord form standard cancellation language "Should any of the above described policies be cancelled before the expiration date thereof, notice will be delivered in accordance with the policy provisions."

UAS 3rd Party Damages

- In any event that the drone is damaged or destroyed, the University is not liable for repairs or replacement.

Privacy Requirements

- UAS shall not be used to monitor or record areas where there is a reasonable expectation of privacy in accordance with accepted social norms. These areas include but are not limited to restrooms, locker rooms, individual residential rooms, changing or dressing rooms, and health treatment rooms.
- UAS shall not be operated over or near University residence halls or otherwise used in a manner that would allow it to monitor or record residential hallways, residential lounges, the interior of campus facilities, or any other area or facility where children are present.

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- UAS shall not be used to monitor or record sensitive institutional or personal information, which may be found, for example, on an individual's workspace, on a computer or other electronic displays.
- UAS shall not be operated over or near adjacent neighborhoods similar to University Terrace which separates Lone Mountain from the main campus. The [USF Drone Map](#) outlines University property boundaries and approved operators may only fly within this designated area.

University Registration

In order to fly a drone on or above University property or at an event hosted by the University, the pilot must request approval from the Department of Public Safety and Department of Risk Management. The [Request for Drone Use Form](#) outlines the information that is necessary to ensure the drone will be used in the correct manner with the required safety procedures. Once this document is received, the Department of Risk Management can review in consultation with the Department of Public Safety and approve the drone use.

This form needs to be completed with a copy of the required license, certificate of insurance (3rd parties) and emailed to the [Department of Risk Management](#) and Department of Public Safety [Dispatch](#).

Definitions

Term	Definition
University of San Francisco Property	Buildings, grounds, and land that are owned by the University or controlled by the University via leases or other formal contractual arrangements to house ongoing University operations.
Certificate of Authorization (COA)	Certificate of Authorization or Waiver. According to the FAA, the COA is an authorization issued by the Air Traffic Organization to a public operator for a specific UAS activity. After a complete application is submitted, the FAA conducts a comprehensive operational and technical review. If necessary, provisions or limitations may be imposed as part of the approval to ensure the UAS can operate safely with other airspace users. In most cases, the FAA will provide a formal response within 60 days from the time a completed application is submitted.

Knowledge Test	The Knowledge Exam is required by the FAA, the applicant for a drone pilot certification must pass this in order to receive the Pilot License.
Unmanned Aircraft Systems (UAS)	UAS are also known as or may be characterized as Drones. According to the FAA, a UAS is the unmanned aircraft and all of the associated support equipment, control station, data links, telemetry, communications and navigation equipment, etc. necessary to operate the unmanned aircraft. UAS may have a variety of names including quadcopter, quadrotor, etc. FAA regulation applies to UAS regardless of size or weight. Model aircraft are not considered by the FAA as UAS and have different regulations.
Model Aircraft	Model aircraft are considered differently by the FAA than other UAS and have different regulations. Model aircraft are not for business purposes, only for hobby and recreation. (Use of UAS related to the University do not qualify as model aircraft and therefore are not subject to model aircraft regulations.)
Third Party (ies)	A person or group other than the principals.
Spotter (Visual Observer)	A spotter's responsibility is to act as a visual observer responsible for monitoring and assessing hazardous situations that may compromise the safety of the operation and will keep the UAS within unaided sight (no binoculars).
Class G Airspace	The portion of the airspace that has not been designated as a Class A, B, C, D, or E. It is therefore designated uncontrolled airspace. Class G airspace extends from the surface to the base of the overlying Class E airspace. Although Air Traffic Control has no authority or responsibility to control air traffic, pilots should remember there are visual flight rules (VFR) minimums that apply to Class G Airspace .
Title 14 of the Code of Federal Regulation	Summary of rules determined by the FAA for unmanned aircraft requirements. (14 CFR) Part 107

Accident Reporting

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For any accident that results in an injury, property damage, or a drone is lost (unreachable location such as in a tree), call the [Department of Public Safety](#) dispatch at (415) 422-2911 and also report the incident to the [Department of Risk Management](#).

The FAA requires notification of certain small-unmanned aircraft system (sUAS) accidents. Part 107.9 requires an accident be reported within 10 days after an operation that involves:

1. Serious injury to any person or any loss of consciousness; or
2. Collision with other Unmanned Aircraft Systems; or
3. Damage to any property, other than the small unmanned aircraft, unless one of the following conditions are satisfied:
 - a. The cost to repair (including material and labor) does not exceed \$500; or
 - b. The fair market value of the property does not exceed \$500 in the event of a total loss

To report a Part 107 Small Unmanned Aircraft System (sUAS) accident, log into your account and submit your report through the [FAA Drone Zone](#).

Sanctions

Any violations of University policies by an individual will be dealt with in accordance with applicable University policies and procedures, which may include disciplinary action up to and including termination of employment and expulsion from the university.

Legal prohibitions regarding physical presence on campus such as trespassing is prohibited. Legal action may also be pursued against any person who operates a UAS in violation of this policy.

The University will not indemnify a non-complying employee for any loss/damage they cause to the University or Third-Party property as a result of the failure to abide by this policy.

Contacts

Subject	Contact	Phone Number	E-mail or URL
Risk Management	Melissa Diaz	415-422-5899	mddiaz2@usfca.edu
Office of Marketing & Communications	Anneliese Mauch	415-422-4781	afmauch@usfca.edu
Public Safety	Kevin Dillon	415-254-1894	kdillon@usfca.edu
Public Safety Dispatch	Dispatch	415-422-4201 non-emergency 415-422-2911 emergency	dispatcher@usfca.edu

Responsibilities

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Risk Management:

- In partnership with Public Safety, takes administrative responsibility for this policy, interprets the policy for the campus, and revises the policy as necessary.
- Evaluates applications to fly drones over campus for compliance with applicable regulations and policies and for impact on public safety, privacy, civil rights, and civil liberties.

Department of Public Safety:

- In partnership with Risk Management, takes administrative responsibility for this policy, interprets the policy for campus, and revises the policy as necessary.
- Evaluates applications to fly drones over campus for compliance with applicable regulations and policies and for impact on public safety, privacy, civil rights and civil liberties.
- Enforces the policy.