

## **Interim** University Policy

Applies to:

Faculty, staff, students, volunteers, vendors, and visitors who seek to: 1) operate a UAS on any university property; 2) operate a UAS while engaging in a university-sponsored event or activity; or 3) use a UAS acquired with university resources.

### **Responsible Office**

### Office of Administration and Planning

### **POLICY**

Issued: 11/20/2015

Revised: 11/19/2025 (interim revision)

The Ohio State University is committed to providing an academically vigorous, safe, and secure environment that promotes the university's land grant mission. **Unmanned aircraft systems (UAS)**, commonly referred to as drones, offer various opportunities to advance the university's mission when operated safely and properly. UAS operations are regulated by the Federal Aviation Administration (FAA) and by federal, state, and local laws. This policy governs the use of UAS on and over **university property** and during **university-sponsored events or activities** (including research and teaching) regardless of location.

Because the university is a no drone fly-zone, anyone who seeks to operate UAS on university property, which includes the reasonable airspace above university property, must receive advance approval in accordance with this policy and comply with all restrictions and conditions set by the university and all applicable laws. Anyone who seeks to operate UAS during university-sponsored events or activities (including research and teaching flights) that occur off university property, and anyone who seeks to operate UAS acquired with university resources off university property, must provide prior notice to the university and confirm they have obtained the appropriate flight authorizations in accordance with this policy.

### **Purpose of the Policy**

To mitigate risks to individuals and organizations potentially affected by UAS activities; promote compliance with applicable laws, university policies, contract provisions, and referenced guidance; and 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.		
Certificate of waiver	A document provided by FAA authorizing deviation from certain federal regulations to the extent specified in the waiver and subject to any conditions or limitations.		
Emergency	An urgent situation where action is taken to promote the safety and security of persons and/or property.		
FAA Part 107	Provided under 14 C.F.R. Part 107, this section sets forth FAA requirements for small UAS operations, not including recreational operations of unmanned aircraft under 49 USC 44809. 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.		
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.		
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.		
Public use certificate of waiver (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.		



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Term	Definition		
Recreational operations of unmanned aircraft	In accordance with 49 U.S.C. § 44809, individuals may operate a small UAS without specific certification or operating authority from the (FAA), provided that the operation is conducted strictly for recreational purposes; follows the safety guidelines of a recognized community-based organization (CBO); remains within the visual line of sight of the operator or a colocated visual observer; yields the right-of-way and avoids interference with manned aircraft is performed by an operator who has successfully completed an FAA-recognized aeronautic knowledge and safety test and can provide proof of passage; and involves an aircraft that is properly registered with the FAA and marked with its registration number prior to any flight.		
Remote pilot in command (RPIC)	The individual who exercises authority over initiating, conducting, or terminating a flight of a UAS and ensures compliance with the regulatory requirements in FAA Part 107.		
University property	Any land, grounds, buildings, or facilities owned, leased, or used by The Ohio State University per formal contractual or legal agreements, and the reasonable airspace above such property. Includes 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, teaching activities and/or flights.		
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, recreational operations of unmanned aircraft, a subset of UAS, should follow the procedures for all UAS in this policy.		

### **Policy Details**

- I. Requests for UAS activities will be processed consistent with applicable federal, state, and local laws; applicable university policies and standards; contract provisions; and referenced guidance.
- II. Operation of any UAS on university property is prohibited unless first approved through the university's UAS request process, which includes completion of an Unmanned Aircraft Systems Operations Agreement. **Remote pilots in command (RPICs)** who wish to operate UAS on university property must request permission and obtain prior approval from the Department of Public Safety as set forth in Procedure I below.
  - A. The Department of Public Safety will:
    - 1. At its reasonable discretion, approve, deny, 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.
    - 4. Consult with content experts as needed.
  - B. Depending on the intended use, location, 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.
- III. The Department of Public Safety will work in conjunction with the Office of Legal Affairs and local law enforcement jurisdictions regarding UAS flights during university-sponsored events or activities that do not occur on university property. RPICs for such flights must provide prior notice of their flights as set forth in Procedure II below.



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- IV. Remote Pilot in Command (RPIC) Responsibilities and Restrictions
  - A. All UAS operations are required to designate one RPIC. RPICs are required to comply with all applicable FAA regulations; federal, state, and local laws; relevant university policies; contract provisions; and referenced guidance before, during, and after any UAS activity.
  - B. RPIC responsibilities include, but are not limited to, possessing the appropriate FAA-issued airman certification, complying with the conditions of any applicable airworthiness certificates or certificates of waiver, conducting all required preflight inspections, adhering to FAA Remote Identification rules, complying with all applicable state laws governing the safe operation of aircraft including <a href="Ohio Revised Code 4561.51">Ohio Revised Code 4561.51</a>, and following university policies and standards governing access to and use of university property.
  - C. Any RPIC who operates a UAS in violation of FAA regulations, applicable laws, university policies and standards, contract terms, or related guidance may be directed by authorized university personnel, acting in coordination with the Department of Public Safety, to immediately cease operations, and the UAS may be subject to confiscation by authorized university personnel. In addition, such violations may be referred to the appropriate university disciplinary process and may adversely impact the consideration of future UAS operation requests by the RPIC.
- V. The FAA may issue Temporary Flight Restrictions (TFRs) over university property or in connection with university-sponsored events or activities (e.g., athletic events), which prohibit any UAS operations within the designated area.
- VI. UAS acquired with university resources or used by the university must be operated under appropriate FAA authorization based on the purpose for the flight, regardless of whether the flight is on or off university property. The FAA authorization will outline the conditions, parameters, and limitations of UAS flight operations. Those operating UAS must also review and be aware of all FAA specifications and file for any necessary amendments or certificates of waiver and receive Air Traffic Control (ATC) approval, if applicable, in advance of UAS operations.
- VII. UAS must not be used for unapproved monitoring, recording, or observing any campus event, activity, or performance.
- VIII. UAS may never 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.
  - IX. 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.
  - X. 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 UAS 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.
  - XI. 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.



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#### **PROCEDURE**

Issued: 11/20/2015

Revised: 11/19/2025 (interim revision)

I. Obtaining Approval for UAS Operation on University Property

- A. Operating a UAS on university property (including regional campuses and other university property outside Columbus) requires prior university approval.
- B. To obtain such approval, RPICs must submit a completed <u>UAS Request Form</u> to the Department of Public Safety as early as possible prior to the proposed flight.
- C. Upon receipt of the completed UAS Request Form, the Department of Public Safety will conduct an initial suitability assessment which can include a request for additional information or clarification from the requestor prior to approval and may provide direction or other requirements for the UAS operation.
- D. The Department of Public Safety will notify the requestor of a decision prior to the intended flight date(s) via the UAS Request Form.
- E. No UAS operation may occur until approval is granted by the university, and the UAS must be operated within the parameters of such approval.
- F. The Department of Public Safety will maintain a record of the decisions consistent with the <u>General Records</u> Retention Schedule.

#### II. Providing Notice of UAS Operation Off University Property

- A. Operating a UAS acquired with university resources off university property, and operating UAS during university-sponsored events or activities (including research and teaching flights) that do not occur on university property (domestic or international), requires prior notification to the university and confirmation of the necessary flight authorizations.
- B. To provide such notice and confirmation, RPICs must submit a completed <u>Off Campus UAS Use Notification</u> <u>Form</u> as early as possible prior to the proposed flight.
- C. In addition, RPICs must follow all laws and regulations governing UAS operation in the jurisdictions where the flights will take place and notify property owners as applicable.
- D. Off Campus UAS Notification forms are stored and managed by the Department of Public Safety consistent with the General Records Retention Schedule.

#### III. UAS Operations Involving Export-Controlled UAS Equipment or Technology

- A. Notwithstanding any other sections of the policy, individuals seeking to acquire, transfer, use, and/or modify controlled UAS equipment or technology must comply with the <a href="Export Control policy">Export Control policy</a>.
- B. Please note that controlled UAS equipment and technology must undergo an export review by the Office of Secure Research which may require a longer evaluation period.

#### IV. Operation of UAS

- A. RPICs must be in possession of an approved UAS Request Form at all times during UAS activity on university property and must present the approved form to any university official or representative with control or jurisdiction over the area or activity upon request.
- B. RPICs must only conduct approved flights within <u>FAA Part 107 limitations</u> and follow all FAA regulations during flight and any applicable Temporary Flight Restrictions or restricted areas.



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- 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 RPIC must postpone the flight until **favorable conditions** are achieved.
  - 1. For flights on university property: The RPIC may seek an extension from the Department of Public Safety at <a href="mailto:emergencymanagement@osu.edu">emergencymanagement@osu.edu</a> within three business days of the original approved flight date(s). If the requestor does not request an extension within three business days, the requestor must reapply pursuant to Procedure I.
  - 2. For flights off university property: The RPIC must submit another <u>Off Campus UAS Use Notification</u> <u>Form</u> prior to any rescheduled flight.

#### V. Accident and Adverse Event Reporting

- A. If an accident involving a UAS operated on university property occurs, the RPIC must:
  - 1. Report it immediately to The Ohio State University Police Division (OSUPD) or the appropriate law enforcement agency.
  - 2. Report it to <u>osurisk@osu.edu</u> as soon as possible.
    - a. OSUPD jurisdiction: OSUPD will forward a copy of its report to <u>osurisk@osu.edu</u> as soon as possible.
    - b. Non-OSUPD jurisdiction: The university will initiate a records request with the law enforcement agency to obtain a copy of the agency's report.
  - 3. Report it 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. If an accident involving a UAS operated off university property occurs, and such accident occurs during a university-sponsored event or activity or involves a UAS acquired with university resources or operated pursuant to formal authorization granted by the FAA to the university, the RPIC must:
  - 1. Report it 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. Report it 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 agency's report.
- C. If an **adverse event** occurs, regardless of location, the RPIC must report it to <u>osurisk@osu.edu</u> as soon as possible with a description of the adverse event.
- D. Upon request, an RPIC 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 RPICs may be responsible for any property damage, losses, costs, or other expenses resulting from the operation of UAS.
- C. RPICs are responsible for fulfilling any reporting obligations under federal, state, or local laws before, during, and after UAS operations.
- D. Any RPIC found to be operating in an unsafe manner may be prohibited from additional flights on university property or during university-sponsored events or activities.



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### Responsibilities

Position or Office	Responsibilities				
Department of Public Safety	<ol> <li>Review and respond to requests for operation of UAS on university property as set forth in the policy.</li> <li>Grant any exceptions to this policy as necessary.</li> <li>Confirm Temporary Flight Restrictions (TFR) or restricted areas as applicable.</li> <li>Work with Office of Legal Affairs and local law enforcement regarding UAS activity during university-sponsored events or activities that do not occur on university property.</li> <li>Maintain UAS decisions consistent with General Records Retention Schedule.</li> </ol>				
Office of Enterprise Risk Management	Receive accident and adverse event reports.				
Office of Legal Affairs	Work with Department of Public Safety and local law enforcement regarding UAS flights during university-sponsored events or activities that do not occur on university property.				
Office of Secure Research	Conduct export reviews of controlled UAS equipment and technology.				
Ohio State University Police Division	Forward all police reports of UAS-involved accidents on university property to <a href="mailto:osurisk@osu.edu">osurisk@osu.edu</a> as soon as possible.				
Remote Pilot in Command (RPIC)	<ol> <li>Obtain prior approval to operate a UAS on university property as set forth in the policy, and operate a UAS within the parameters of such approval.</li> <li>If applicable, sign an Unmanned Aircraft Systems Operations Agreement.</li> <li>Be in possession of approved UAS Request Form during UAS activity and present form upon request as set forth in the policy.</li> <li>Notify university and confirm all necessary flight authorizations for UAS operations off university property as set forth in the policy.</li> <li>Follow all laws, regulations, and university policies and standards governing UAS as set forth in the policy.</li> <li>Comply with export regulations and Export Control policy for UAS operations involving export-controlled UAS equipment or technology.</li> <li>Report accidents and adverse events as set forth in the policy and assist university personnel upon request with any subsequent analysis, investigation, or remediation efforts.</li> <li>Fulfill reporting obligations required by law before, during, and after UAS operations.</li> </ol>				

#### Resources

**Forms** 

UAS Request Form, go.osu.edu/UASFlightRequest

Off Campus UAS Use Notification Form, go.osu.edu/OffCampusUASNotification

University Governance Documents

The Ohio State University Code of Student Conduct, trustees.osu.edu/bylaws-and-rules/code

Faculty Rule 3335-5-04, trustees.osu.edu/bylaws-and-rules/3335-5

Export Control policy, go.osu.edu/export-control-policy

General Records Retention Schedule, go.osu.edu/retention-schedules

Purchasing policy, go.osu.edu/purchasing-policy

University Space Standards, freedomofexpression.osu.edu/documents/university-space-standards-2024.pdf

#### Additional Guidance

Unmanned Aircraft System (UAS)/Drone Flight Request Webpage, go.osu.edu/uas-faq

FAA Unmanned Aircraft Systems Website, faa.gov/uas

FAA Section 44807, https://www.faa.gov/uas/advanced\_operations/certification/section\_44807

FAA Commercial Operators, https://www.faa.gov/uas/commercial operators

Uncrewed Aircraft Systems (UAS) Operations in Ohio, <u>transportation.ohio.gov/programs/aviation/resources/uasoperations</u>

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#### **Contacts**

Subject	Office	Telephone	E-mail/URL
Policy questions and requests to operate UAS	Department of Public Safety	614-247-4911	emergencymanagement@osu.edu
Export control questions	Office of Secure Research		exportcontrol@osu.edu

### **History**

Interim Issued: 11/20/2015 Edited: 12/22/2015 Revised: 11/15/2017 Revised: 04/02/2018 Interim Revised: 11/19/2025

Revision included transfer of ownership from Office of Academic Affairs to Office

of Administration and Planning