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## UNIVERSITY OPERATING PROCEDURE

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### Title:

advance approval of the University's UAS Working Group (UASWG). Securing advance approval and/or Model Aircraft involves filing an Application with the UASWG, detailed herein.

Approval may only be granted for one of the following three purposes, consistent with the rules and regulations of the Federal Aviation Administration (FAA), local authorities, and the University:

1. "Public Use" in support of UVM research;
2. "Commercial Use" in support of UVM's general administrative needs; or
3. "Educational Instruction" sponsored by the University, and for students of, or participants in University programs in furtherance of its educational mission

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Approval by the UASWG may be either a "blanket approval" for a specific period of time, or for a "single flight".

The use of UAS and Model Aircraft on University property, at University sponsored activities, or otherwise on behalf of The University, and not fitting within one of the three categories identified above is not permitted.

Securing the approval of the UASWG, and applicable authorities, is the sole responsibility of the Operator of a given flight in accordance with these procedures.

Any person operating a UAS or Model Aircraft is personally responsible for complying with FAA regulations, state and federal laws and University policies. UAS and Model Aircraft operators who violate FAA rules risk legal action under all applicable federal, state and local laws. UVM students and employees may also be subject to disciplinary action outlined in UVM's Code of Student Conduct and applicable University practices, policies, and collective bargaining agreements, including applicable grievance procedures, respectively, for violation of this University Operating Procedure (UOP).

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<sup>1</sup>"Educational Instruction" may occur without express FAA approval, provided the students / participants do not receive compensation for the

## Applicability of the Procedure

This UOP applies to all UVM employees, students, commercial contractors, affiliated organizations, and campus visitors who want to fly a UAS and/or Model Aircraft on UVM property, university-sponsored events, or otherwise on behalf of the University, whether on or off campus. However, operation of UAS and Model Aircraft by members of the University community outside of these parameters is still regulated by the FAA and by federal, state, and local laws.

## Definitions

- 44807 Exemption: An FAA exemption based on Section 44807 of the FAA Modernization and Reform Act of 2012 (FMRA) which grants an individual or entity the ability to operate a UAS for civil and nongovernmental purposes and activities, other than recreational or hobbyist activity.
- Certificate of Authorization (COA): A certificate granted by the FAA under Section 44807 of FRMA, which allows an entity to legally operate a specific UAS in a certain location for a specific purpose. A "Public Use" COA is granted to a public agency or organization to operate a specific aircraft (weighing more than 55 pounds) for a specific purpose in a specific location. A Public Use COA for a UAS is only issued by the FAA after the process of determining public status, government use, and an operational and technical review.
- Educational Instruction: Credit or noncredit bearing coursework pertaining to the principles of flight, aerodynamics, and/or airplane design and construction.
- Model Aircraft: A type of unmanned aircraft that is (1) flown for hobby or recreational purposes; (2) capable of sustained flight in the atmosphere; and (3) flown within visual line of sight of the aircraft operator. Model Aircraft flown on UVM property, at University sponsored events, or otherwise on behalf of the University may not exceed a weight of 55 pounds, and must be [registered with the FAA](#)
- Operator: The individual responsible for flight operation of the UAS or Model Aircraft. The FAA may refer to this person as the ~~Role~~ Pilot in Command (PIC) when flying UAS.
- Part 107: Part 107 refers to the Small Unmanned Aircraft Rule implemented by the FAA, applying to commercial operations of UAS less than 55 pounds. This regulation regulates operational limitations, RPIC certification and responsibilities, and aircraft requirements for all UAS flown for work, business, and commercial purposes. ([https://www.faa.gov/uas/commercial\\_operators/](https://www.faa.gov/uas/commercial_operators/))
- TRUST: TRUST is an aeronautical knowledge and safety test developed by the FAA for purely recreational drone flyers. ([https://www.faa.gov/uas/recreational\\_flyers](https://www.faa.gov/uas/recreational_flyers))
- Unmanned Aircraft System (UAS): UAS are also known as or may be characterized as ~~ones~~ 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.
- UAS Working Group (UASWG): The group designated by the Chief Safety and Compliance Officer with the authority to oversee all UAS and Model Aircraft activities on University property, at University sponsored events and activities, and otherwise on behalf of the University.



## Procedures

### Securing Approval for Use of UAS or Model Aircraft

The Operator is ultimately responsible for the safe operation of their UAS and/or Model Aircraft, and as such is responsible for securing advance approval of the UASWG. In the case of Educational Instruction, the UVM faculty or staff member serving as the Course Instructor is responsible for securing advance approval of the UASWG.

Anyone who seeks permission from the University to operate a UAS or Model Aircraft under the terms of this UOP must seek and receive approval from all appropriate agencies, to include the FAA and local authorities, in advance of requesting University approval.

For planned flight activities constituting Public or Commercial Use, or alternatively Educational Instruction, the Operator or Course Instructor must submit the following to the UASWG a minimum of 15 business days in advance of the first planned flight or course start date, as appropriate. The UASWG shall expedite the review of UAS operating plans intended to address short notice phenomena (e.g., flooding) and/or emergency requests from state and/or local officials.

In addition, the operation of a UAS or Model Aircraft owned by a third party over University property, at University sponsored activities, or otherwise on behalf of the University, must be under a contract which holds the University harmless from any resulting claims or harm to individuals and damage to University property. The third party operator must adhere to all FAA requirements, and provide the University with proper proof of Aircraft Liability insurance equal to greater than \$1 million per occurrence and \$2 million annual aggregate for bodily injury and property damage liability; and commercial general liability insurance in an amount not less than \$1,000,000 per occurrence; \$2,000,000 annual aggregate. Each policy name "The University of Vermont's officers, employees and agents" as an additional insured on that policy.

A complete Application for UAS/Model Aircraft necessarily includes the following information and supporting documentation:

- (1) UAS / Model Aircraft Manufacturer, Model, Weight, and FAA Registration Number;
- (2) Dates of planned operation;
- (3) Locale(s) of planned operation, including the resident or temporary populations therein;
- (4) Purpose(s) of the operation;
- (5) The identity of pilot(s) or other remote operator(s);
- (6) All forms of data (including imagery) to be collected;
- (7)

- (8) Provisions for security of the equipment, both during and outside of operation, and of any sensitive data collected.

As part of the Application, the applicant must also:

- (1) Attach proof that the Operator is certified or licensed to operate the UAS or Model Aircraft in accordance with Federal regulations.
- (2) Attach proof of FAA UAS registration.
- (3) Attach proof of insurance (usually certificate from your insurer) clearly indicating the minimum liability insurance coverage as noted in paragraph 4 above
- (4) Attach a risk assessment or flight checklist for the flight(s) (may be embedded in the application or attached as a separate document)
- (5) Attach a map showing the planned flight in Keyhole Markup Language (KML) or Geographic Information System (GIS) layer.
- (6) Attach a signed UVM risk acknowledgment (indemnification) of UAS operations for each participant.
- (7) Verify Burlington International Airport (BTV) has been notified and acknowledges the planned flight (if within 5 miles of BTV). Attach proof of airspace authorization when flying within BTV Class C airspace, either authorized through BTV's Low Altitude Authorization and Notification Capability (LAANC) or by FAA approval of an airspace authorization request submitted via FAA ~~Zone~~
- (8) Attach any relevant and FAA approved operational waivers, planning to operate outside the limitations of a regulation.

#### Review of Use Applications by the UASWG

Upon receipt of an Application for Public or Commercial Use, or Educational Instruction, the UASWG Chair will convene the UASWG no later than five (5) working days after receipt to review the submission.

For approval of an Application by the UASWG:

- (1) The Application and supporting documentation must be forthcoming and complete in its content;
- (2) The envisioned operation(s) must comply with applicable laws, government regulations, and other University policies;
- (3) The envisioned operation(s) must not pose an unacceptable threat to health, safety, privacy, or the environment, either in an absolute sense or compared to other methods of obtaining the desired information; and
- (4) The envisioned operation(s) must be judged by the UASWG to be in the best interest of the public and The University.

If an Application is found to meet the four above criteria, the UASWG will recommend its approval to the Chief Safety and Compliance Officer. The decision, which is final, will be promptly communicated to the requestor.

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complying with and contacting the BTV ATIS immediately preceding flight operations for final clearance, as well as the flight has concluded.

If an Application is found to be incomplete, the UASWG will return it to the requestor with recommendations for next steps.

If the proposed operation(s) cannot be conducted within the restrictions of this UOP and current federal, state, and local laws, the UASWG will deny approval in consult with the Chief Safety and Compliance Officer.

### Safety and Privacy Guidelines

Operators of UAS and Model Aircraft should always keep safety in mind, particularly the risk of injury to people and property. The following procedures must be followed at all times:

- x Operators should be aware of potential failure modes for the system and plan to conduct operations to minimize the risk to persons and property with these events in mind (battery failure, wind/weather conditions, control signal loss). Operators should test, to the extent reasonably possible, the function of built-in safety features (such as loss of signal return and kill switches).
- x Operators should establish and keep detailed and thorough checklists for all necessary preflight, and postflight procedures, and highlight important safety events (such as arming).
- x When planning a flight, Operators must consider the risks to persons or property in the flight path and surrounding areas. These risks, and mitigation strategies to reduce them, such as placing safety barriers around, or visual indicators of, any areas of danger when systems are being tested or are in use, must be addressed in the Operators' application to the UASWG.
- x UAS and Model Aircraft must have an FAA Registration Number affixed to it, as well as an identification plate with the name, address, and phone number of the owner.
- x Operators must ensure preflight detailed and thorough training of all Operators and flight crew specific to the UAS or Model Aircraft being used.
- x UAS and Model Aircraft should only be flown during daylight hours and in good weather. Nighttime flying is not permitted unless otherwise requested via appropriate application to the UASWG and

appropriate application to the UASWG and approved in writing thereby, in addition to the provision of a successful Operational Waiver from the FAA allowing such operations.

- x UAS and Model Aircraft may not be operated in populated areas or near large groups of people, such as sporting events, concerts, and festivals, unless otherwise requested via appropriate application to the UASWG and approved in writing thereby, in addition to the provision of a successful Operational Waiver from the FAA allowing such operations.

### Required Reporting

For UAS flight operations taking place on the UVM Campus, operators must Inform UVM Police Services of their flight location and timing within 24 hours prior to beginning the operation.

Operators must report all accidents involving their UAS that result in damage to the UAS, damage to property, and/or a serious injury or death of a participant or nonparticipant to the UASWG within 24 hours after an accident has occurred. Operators should use UVM's incident/accident report form when reporting an incident/accident to the UASWG. Operators must also follow current federal regulations for incident reporting to the FAA.

### Contacts

Questions concerning the daily operational interpretation of this UOP should be directed to the following:	
Title(s)/Department(s):	Contact Information:
Emergency Manager	(802)656-4363 <a href="mailto:emergency@uvm.edu">emergency@uvm.edu</a>
Director of Operations, Office of the Vice President for Research	(802) 656-4566 <a href="mailto:dan.harvey@uvm.edu">dan.harvey@uvm.edu</a>

### Forms/Flowcharts/Diagrams

- x Application to Fly UAS / Model Aircraft
- x Risk Acknowledgement (indemnification)
- x Risk Assessment Template / Preflight checklist
- x Incident / Accident Report

### Related Documents/Policies

- x [Code of Student Conduct](#)
- x [Export Controls Policy](#)
- x [Facilities and Grounds Use Policy](#)
- x [Filming on Campus Procedure](#)
- x [Privacy Policy](#)
- x [Video Surveillance Procedure](#)

### Training/Education

Training will be provided on an as-needed basis as determined by the Approval Authority or the Responsible Official.

## Testing/Licensure/Certification

Testing/Licensure/Certification related to this policy is as follows:

Training Topic	Drone Pilot Certificate		
Audience:	Anyone operating a Model Aircraft or UAS under this UOP		
Delivered/ Administered by:	FAA	Type of Testing, License or Certification Required:	Part 107 Pilot's License

## About This Procedure

Responsible Official:	Chief Safety and Compliance Officer	Approval Authority:	Chief Safety and Compliance Officer
Affiliated Policy Number(s):	None	Effective Date:	August 30, 2016
Revision History:	<ul style="list-style-type: none"> <li>x Approved by the Vice President for University Relations and Administration August 3 2016</li> <li>x Responsible official officially changed from the Vice President for University Relations and Administration to the Vice President for Operations and Public Safety (VPOPS) on October 1, 2019 Title of VPOPS changed to Chief Safety and Compliance Officer Jul 2022.</li> <li>x March 3, 2021</li> <li>x Minor Revisions November 25, 2024</li> </ul>		

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