

## **University of Michigan Policy on the Operation of Unmanned Aircraft Systems (UAS)**

### **I. PURPOSE AND SCOPE**

The University of Michigan (U-M) supports the safe use of unmanned aircraft systems and unmanned aerial vehicles (hereafter referred to as “UAS”) on or off U-M properties, in the course of research, educational activities and other endeavors in the pursuit of the University’s mission.

This policy applies to both the outdoor and indoor use of UAS operated by anyone for any purpose, from, on, or over the U-M Ann Arbor, Dearborn, or Flint campuses, and other U-M properties (e.g., Biological Station, Pellston, MI; Stinchfield Woods, Pinckney, MI; Camp Davis, Jackson, WY). This policy also applies to the use of UAS by U-M faculty, students, and staff *off* of U-M property for U-M sanctioned activities. Sanctioned Activity means an activity which takes place in the course of research, educational activities and other endeavors in the pursuit of the U-M mission with the approval of an Executive Officer, Dean, Director or Department Head within the University of Michigan.

The U-M Risk Management Department is charged with implementation of this policy, and thus will be responsible for administering the review and approval process for UAS activities subject to this policy.

### **II. DEFINITIONS**

For the purposes of this policy, a UAS is an aerial vehicle or system, whether or not capable of carrying humans or cargo, that is operated remotely or that is capable of navigating autonomously.

The term “system” refers to the vehicle(s), payload(s), operating environment, and the personnel involved (e.g., Remote Pilot in Command (RPIC), Visual Observers (VO), Operating Site Property Owner and/or manager (OSPO), Principal Investigator (PI), Staff, Students).

### **III. USE OF UAS FROM, ON, OR OVER U-M ANN ARBOR CAMPUS PROPERTY**

With regard to UAS activities from, on, or over the Ann Arbor campus, this policy implements Article XVI of the Regents’ Ordinance (“Article XV”) and provides the mechanism for seeking a waiver of Article XVI.

#### **a. Outdoor Use of UAS**

Outdoor use of UAS **by anyone** from, on, or over U-M Ann Arbor campus property is

## U-M Policy on the Operation of Unmanned Aircraft Systems

generally prohibited, unless permitted through a waiver of Article XVI or otherwise exempted from that Article under Section 5. The process for obtaining a waiver is initiated through submission of an application and attestation to the Risk Management Department. After review of the application and any supplemental information provided or requested, Risk Management will issue its recommendation to the Executive Vice President and Chief Financial Officer (EVP- CFO) (or designee(s)), who can either accept or reject Risk Management's recommendation. If the EVP-CFO (or designee(s)) issues a waiver, it will be valid for a specific use and time period. If the EVP-CFO (or designee(s)) declines to issue a waiver, the use will be prohibited.

### b. *Indoor Use of UAS*

Indoor use of UAS does not require an application to Risk Management or a waiver from Article XVI of the Regents' Ordinance **provided that**:

- 1) The operation will occur in a space or building that has established policies and procedures to permit the safe operation of UAS,
- 2) The operation is conducted in accordance with those policies and procedures,
- 3) The building manager has granted permission for the operation.

Building managers should refer to the [Indoor Operation of Unmanned Aircraft Systems Guideline](#) issued by the Department of Environment, Health & Safety for assistance in setting policies and procedures for their location.

## IV. **USE OF UAS ON U-M DEARBORN OR U-M FLINT CAMPUS PROPERTY**

With regard to UAS activities from, on, or over the Dearborn or Flint campuses, this policy implements Article XVI of the Regents' Ordinance ("Article XVI") and provides the mechanism for seeking a waiver of Article XVI.

### a. *Outdoor Use of UAS*

Outdoor use of UAS **by anyone** from, on, or over U-M Dearborn and U-M Flint campus property is only permitted through written permission granted by the Chancellor of that campus or designee(s). The process for obtaining this permission is initiated through submission of an application and attestation to the Risk Management Department.

After review of the application and any supplemental information provided or requested, Risk Management will issue its recommendation to the Chancellor (or designee(s)), who can either accept or reject Risk Management's recommendation. If the Chancellor (or designee(s)) grants permission, it will be valid for a specific use and time period. If the Chancellor (or designee(s)) declines to grant permission, the use will be prohibited.

### b. *Indoor Use of UAS*

## U-M Policy on the Operation of Unmanned Aircraft Systems

Indoor use of UAS does not require an application to the Risk Management or written permission from the Chancellor **provided that**:

- 1) The operation occurs in a space or building that has established policies and procedures to permit the safe operation of UAS,
- 2) The operation is conducted in accordance with those policies and procedures,
- 3) The building manager has granted permission for the operation.

Building managers should refer to the [Indoor Operation of Unmanned Aircraft Systems Guideline](#) issued by the Department of Environment, Health & Safety for assistance in setting policies and procedures for their location.

### V. USE OF UAS FROM/ON/OVER OTHER U-M PROPERTIES

Operation of a UAS **by anyone** on other U-M properties, such as at the Biological Station in Pellston, MI; at Stinchfield Woods in Pinckney, MI; or at Camp Davis in Jackson, WY; is prohibited unless the use is recommended for approval by the Risk Management Department and a waiver is issued by the EVP-CFO, or their designee. The process for obtaining approval is initiated through submission of an application and attestation to Risk Management, along with written permission from the Operating Site Property Manager. After review of the application and any supplemental information provided or requested, Risk Management will either approve or deny the requested permission. If Risk Management grants permission, it will be valid for a specific use and time period. If Risk Management denies the request, the use will be prohibited.

### VI. USE OF UAS OFF U-M PROPERTY

If the UAS is to be operated by U-M faculty, staff, or students *in connection with* a UM-sanctioned activity *off* U-M property, the use must be approved by Risk Management. The process for obtaining approval is initiated through submission of an application and attestation to Risk Management. For uses off U-M property, Risk Management will not consider an application until written permission from the Operating Site Property Owner and/or manager is obtained and submitted. After review of the application and any supplemental information provided or requested, Risk Management will either recommend approval and a waiver issued by the EVP-CFO, or their designee, or deny the requested permission. If permission is granted, it will be valid for a specific use and time period. If Risk Management denies the request, the use will be prohibited.

*Risk Management does not have authority with respect to **off-property uses a)** by those unaffiliated with U- M, or b) by U-M community members for personal uses or other uses unconnected with any U-M activities.*

### VII. FAA AUTHORIZATIONS

## U-M Policy on the Operation of Unmanned Aircraft Systems

Risk Management's review of applications for use of UAS will include the following considerations:

All University faculty, staff, students, and visitors who intend to operate UAS outdoors under this policy must, as a condition of approval under this policy, demonstrate compliance with at least one of the following: (1) **14 CFR Part 107 (Operation and Certification of Small Unmanned Aircraft Systems)**; (2) the University's (or other) **Grant of Exemption pursuant to Section 333 of the FAA Modernization and Reform Act of 2012**; or (3) **Section 336 of the FAA Modernization and Reform Act of 2012**, which covers educational or hobbyist use. All University faculty, staff, students, and visitors operating UAS must comply with all applicable Federal Aviation Administration regulations, as well as other federal, state and local laws.

### **VIII. POST-FLIGHT REPORTING REQUIREMENT**

Upon request by Risk Management, a post-flight report will be submitted to Risk Management within two days, including details about actual flight operations and any incidents during flight, including any RPIC loss of visual line-of-sight.

### **IX. PENALTIES FOR UNSAFE OR UNAUTHORIZED USE OF UAS**

Penalties for unsafe or unauthorized use of UAS by faculty, students, staff, or visitors to the U-M Ann Arbor campus may include the criminal and/or civil penalties described in Article XVI of the Regents' Ordinance. Penalties for unsafe or unauthorized use of UAS on the U-M Dearborn or U-M Flint campuses, or on other U-M property, may include criminal and/or civil penalties under other applicable law. In addition, in either case, individuals may also be subject to discipline under other applicable institutional policies. Finally, Risk Management can recommend loss of flying privileges under this policy for a year upon the first transgression, and a permanent loss of flying privileges under this policy upon a repeat transgression.

### **X. REFERENCES**

[Regents' Ordinance Article XVI](#)  
[University of Michigan Policy on the Operation of Unmanned Aircraft Systems \(UAS\)](#)  
[UAV Application and Attestation of Compliance](#)  
[FAA Drone Use Regulations and Guidance](#)  
[U-M EHS Indoor Operation of Unmanned Aircraft Systems \(UAS\) Guideline](#)  
[U-M Unmanned Aircraft Systems \(UAS\) Outdoor Flight Operations Manual](#)  
[U-M Unmanned Aircraft Systems \(UAS\) Flight Log Report](#)

### **VII. HISTORY OF POLICY**

Initial approval date: January 12, 2017

Technical edit (reference to EHS Indoor Guideline): July 27, 2017

Revision date: November 1, 2022

## U-M Policy on the Operation of Unmanned Aircraft Systems

### VIII. APPROVALS

This policy has been approved by the following Executive Officers who have authority over this area of compliance:

**Geoffrey Chatas**

Executive Vice President and Chief Financial Officer

**Domenico Grasso**

Chancellor, U-M Dearborn

**Debasish Dutta**

Chancellor, U-M Flint

**Unmanned Aircraft Systems (UAS)  
On and Off U-M Property:  
Paths for U-M approval based upon location of use**

<b>Where:</b>	<b>U-M Ann Arbor, Dearborn and Flint campus property and other U-M owned property in the State of Michigan</b>  ~ Subject to Regents' Ordinance Article XVI ~		<b>Off U-M Property</b>  Required: Risk Management Approval
<b>Who:</b>	<b>Outdoor</b>  Required: Risk Management Approval and Waiver of Regents' Ordinance	<b>Indoor</b>  Required: Building Manager Approval	
<b>U-M Faculty, Students, Staff, for U-M activities**</b>	Flights are prohibited by Article XCI of Regents' Ordinance, unless a waiver is granted by	Flights allowed as an exception to Regents' Ordinance if building has policies and procedures for	1) <b>Application to Risk Management required</b> along with written

## U-M Policy on the Operation of Unmanned Aircraft Systems

	<p>EVP-CFO or Chancellor after application to, and a favorable review by Risk Management</p> <p>1) Applications to Risk Management required. Written permission from U-M building/site manager <u>may</u> be required.</p> <p>2) Final approval (waiver of ordinance) issued by:</p> <p style="margin-left: 20px;">a. EVP-CFO or designee for Ann Arbor campus/other U-M property</p> <p style="margin-left: 20px;">b. Chancellor or designee for Dearborn or Flint campuses</p>	<p>UAS and permission from building/site manager received. Risk Management reserves the right to review building policies for adequacy.</p> <p>1) No application or waiver required.</p> <p>2) Final Approval: Building Manager</p>	<p>permission from the property owner.</p> <p>2) <b>Final approval:</b> Outcome of review (approval or disapproval) will be issued from Risk Management directly. No waiver needed.</p>
<b>Persons unaffiliated with U-M</b>	Same as above. **Purpose for proposed use will be considered.	Same as above. **Purpose for proposed use will be considered.	<b>Not applicable if not for U-M activity.</b>

\*\*The U-M Policy on the Operation of Unmanned Aircraft Systems states "The University of Michigan supports the safe use of unmanned aircraft systems and unmanned aerial vehicles on or off U-M properties, in the course of research and educational activities and other endeavors in the course of research and educational activities and other endeavors in the pursuit of the University's mission." Risk Management does not have authority with respect to off-property uses by those unaffiliated with U-M, or by U-M community members for personal uses or other uses unconnected with any U-M activities.