

LUTHER COLLEGE

POLICIES AND PROCEDURES

Department:	Facilities and Administrative Services
Subject:	Unmanned Aerial Vehicle (UAV) Policy
Date Issued:	October 7, 2015
Date Revised:	September 17, 2020
Approved By:	Reviewed at Cabinet, Approved by President, September 23, 2020

I. Policy/Procedure

This policy outlines the guidelines for use of unmanned aerial vehicles (UAVs) on Luther College property.

II. Purpose

The purpose of this policy is to ensure that any approved use of UAVs on Luther College property provides a high degree of safety and security for our students, faculty and staff. It is important to recognize the risks in order to safeguard the property, finances and reputation of the College as well as the property, wellbeing and privacy of those who work and study at Luther College.

III. Scope

This policy applies to all parties accessing Luther College property with UAVs

IV. Terms and Definitions

- College – refers to Luther College
- UAV- An unmanned aerial vehicle; a radio-controlled aircraft piloted from the ground; drone
- FAA- Federal Aviation Administration

V. Procedures and Guidelines

The following guidelines have been established to regulate the use of UAVs on Luther College property in accordance with FAA guidelines. The FAA currently authorizes the use of UAVs for commercial, recreational or business purposes.

- A. Use of UAVs by students and members of the general public on Luther property is prohibited.
- B. Use of UAVs by Luther employees on Luther property is restricted pending approval for appropriate use.
- C. In order to seek authorization for appropriate use of UAVs on Luther's campus, the following requirements must be met:
 - The UAV operator must be an FAA-Certified Drone Pilot in good standing
 - The FAA-Certified Drone operator must:
 - provide proof of current licensure
 - know the Rules of the Sky and where it is and is not safe to fly
 - refer to the FAA B4UFLY mobile app or a similar app to check for flight restrictions prior to flying
 - be knowledgeable of FAA, Title 14, Part 107 regulations for Small Unmanned Aircraft Systems
 - be knowledgeable of operations that require FAA waivers under Part 107, Subpart D-Waivers

- maintain a detailed log of any and all flight activity
 - The log of flight activity will become a permanent record of Luther College
 - must be maintained for 10 years or a time period that correlates with the statute of limitations
 - A copy of the log must be submitted to the Director of Risk Management and Internal Controls on a weekly basis
 - Be mindful of potential failure modes for their UAV systems
 - Maintain a detailed maintenance log
 - A copy of the maintenance log must be submitted to the Director of Risk Management and Internal Controls on an annual basis by September 1
 - Be mindful and respectful of individual privacy and safety concerns
- The UAV must be registered
 - Registration fee is the responsibility of the department
 - Drone must be marked with registration number
 - Drone operator must carry proof of registration in compliance with the FAA
 - The UAV must be operated under FAA Guidelines Part 107–Small Unmanned Aircraft Systems (https://www.faa.gov/uas/commercial_operators/)
 - Luther College departmental use of UAVs will be limited to
 - Submission of the Luther College UAV Authorization Request Form to the appropriate vice-president
 - Approval of the vice-president in compliance with the policy
 - Third-party UAV operators or services may be hired in compliance with the Luther College Contracts Policy (https://www.luther.edu/policies/assets/Contracts_Policy.pdf)
 - A policy for UAV property and liability insurance must be secured
 - All insurance coverage is handled by contacting the Director of Risk Management and Internal Control
 - The requesting department will be responsible for any insurance costs
 - Insurance coverage is subject to the restrictions placed by the insurance carriers and to the availability and affordability of the premiums

D. Guidelines for UAV use:

- Operate the UAV in compliance with the FAA and the Luther College UAV Policy
- Authorized use should be discussed with the Director of Risk Management and Internal Controls
- Flight plan must be submitted to Facilities Services for record-keeping purposes
- Employees must be authorized as Luther College UAV operators
- Luther owned and operated UAVs are restricted for use on Luther property only
- Luther owned and operated UAVs are not for hire
- Operators must provide a detailed flight itinerary in advance to facilities
 - Preferably a 48 hour notice
 - Within a reasonable time frame, for example:
 - Within one week
 - This coming weekend
 - Generic time frame, weather permitting
 - Exceptions may be made on a case by case basis
- Only those covered under Luther’s insurance policy will be allowed to operate the UAV
- Preflight performance checks will be conducted before each flight
- Flights will only take place during daylight hours
- Flights will only take place within visual line of sight of the operator
- The operator must assess weather conditions, airspace restrictions and the location of people

- to reduce risks in the event he or she loses control of the UAV
- The UAV may not fly over people, except those directly involved with the flight
- The UAV must operate below 400 feet above ground level and no faster than 55 mph
- The UAV must operate at a distance far enough from the residence halls and other Luther-owned houses to ensure no violations of privacy
- The UAV must stay at least three miles away from airports and out of airport flight paths and restricted airspace areas, and obey any FAA Temporary Flight Restrictions
- The operator will watch out for and avoid manned aircrafts. If there is a risk of collision, the UAV operator must be the first to maneuver away
- The operator will discontinue the flight when continuing would pose a hazard to other aircrafts, people or property
- The UAV must not be used to film:
 - inside of buildings
 - inside of buildings from the outside
 - used in any other manner that would invade individuals' reasonable expectations of privacy
- Operators are required to work alongside a safety observer who is responsible for:
 - Enhancing the UAV operator's visual range
 - Informing the operator of any hazards as they may evolve during the flight including pedestrians, vehicles, aircrafts or animals entering the flightarea
 - Actively engage with onlookers and direct them to stay clear of the UAV and operator
 - Ensuring the privacy and safety of others
- The Office of Marketing and Communication works on behalf of any Luther College department, program, student group or outside entity and must be consulted and review any photo or video intended for public visibility. In addition, video footage:
 - Must be reviewed by the operator and their supervisor and/or vice president
 - Must ensure that the video footage is edited for acceptable content and appropriate use
 - Must ensure that the video footage is not for sale
 - Must ensure that video footage contains
 - no materials that would be detrimental to the privacy of others
 - no materials that would be detrimental to the reputation or the integrity of Luther College, their students, staff, faculty, or visitors

VI. Confidentiality and Record

- The Director of Risk Management and Internal Controls will facilitate the authorization process and the Facilities Services office will be the keeper of records for all UAV information and activity.
- Changes in the FAA's regulation of commercial UAV operation, or the exemption application process, beyond this policy's issue date may require an update to this policy.

LUTHER COLLEGE
UNMANNED AERIAL VEHICLE (UAV) AUTHORIZATION OF USE

***Authorization by Luther College must be granted prior to any use of UAV on Luther College property**

<u>FAA-Certified DroneOperator</u>
Name:
Phone Number:
Email Address:

<u>Safety Observer</u>
Name:
Phone Number:
Email Address:

Purpose/Objective of request:

UAV Information

Aircraft type, manufacturer, model:

Associated specifications (example: number and type of cameras, etc.):

Flight Itinerary

Date:

Total Flight Time:

Flight Path:

Operator Qualifications

Has the Operator verified any flight restrictions from the FAA? Yes No

Has the Operator received verification that insurance has been secured? Yes No

(Documentation of FAA-Certified Drone Pilot must be attached to this form)

**By signing this authorization form you acknowledge that you have read Luther College's UAV Policy and agree to comply with the guidelines for UAV use as outlined in the policy*

Operator

Printed Name

Signature

Date

Safety Observer

Printed Name

Signature

Date

Department Supervisor

Printed Name

Signature

Date

Vice President

Printed Name

Signature

Date