

Institutional Governance
Smith College
Unmanned Aircraft Systems and Model Aircraft

Approved:

Date Established:

Responsible Office: Office of the Provost/Dean of Faculty **Date Last Revised:**

Responsible Administrator: Director of Laboratory Health and Safety

Drafted By: Director of Compliance & Risk Management

Statement

The operation of Unmanned Aircraft Systems (UAS) and Model Aircraft is regulated by the Federal Aviation Administration (FAA) and as well as relevant state laws and local ordinances. Smith College is establishing procedures necessary to ensure compliance with these legal obligations and to reduce any risk to safety, security and privacy.

Scope

This policy applies to:

1. Smith College employees and students operating unmanned aircraft systems in any location as part of their College employment or as part of College activities;
2. Operation by any person of unmanned aircraft system or model aircraft on or above Smith College property within 400 feet of the ground surface;
3. Hiring for or contracting for any unmanned aircraft services by a College department.

Responsibilities

1. For following policy: Employees and students as applicable.
2. For policy development, documentation, and implementation: Director of Laboratory Safety and Compliance in conjunction with the Safety Committee on Research and Instruction (SCRI), the Vice President for Finance and Administration and other stake holders such as Athletics, Communications, MacLeish Field Station, and Physical Plant.
3. For enforcement of policy: Campus Police and the Vice President for Finance and Administration.

Policy

Smith College employees and students must comply with relevant federal, state, and local laws and regulations pertaining to the operation of Unmanned Aircraft Systems (UAS). It is recognized that the risks associated with UAS operations generally increase with aircraft weight and with proximity to congested areas. Some UAS operations may therefore require additional

safety measures, policy considerations, and insurance provisions, or in more extreme cases, may only be conducted by third parties with suitable qualifications, equipment, and insurance.

Procedures

1. All members of the College community are personally responsible for complying with FAA regulations, state and federal laws, and Smith College policies, including but not limited to the [FAA Small Unmanned Aircraft Rule \(Part 107\)](#).
2. Operational UAS weight restrictions for college employees and students operating as part of their College employment or as part of College activities:
 - a. **Research and educational use:** under 55lb as regulated by the FAA
 - b. **Any other purpose than research or education:** under 10lb as mandated by Smith College's insurance carrier.
3. Any UAS operator who intends to operate a UAS on Smith College property or in affiliation with Smith College must first receive written permission from the Director of Laboratory Safety and Compliance.

Operators can apply for authority here [link to permission web form].

- a. Operators must show the following in order to be granted permission:
 - i. **Any individual operating the UAS as part of their College employment or as part of College activities:** Evidence of Remote Pilot's License
 - ii. **For UASs weighing more than 250 grams:** evidence of registration as per FAA requirements
 - iii. **Third parties, including student hobbyists:** proof of liability insurance of no less than \$1M for UAS operations. Individuals can purchase coverage through the Academy of Model Aeronautics [link to AMA web page]
- b. Director of Laboratory Safety and Compliance reserves the right to deny any operator the authority to operate a UAS on Smith College property or in affiliation with Smith College
 - i. Operators who feel they may have been unfairly denied authority to operate a UAS may appeal the decision to the Associate Provost.
- c. **Operators must carry written evidence of permission at all times while operating UAS.**

- As per FAA guidance, UAS operations are mapped to a risk matrix with safety measures and approval requirements commensurate with the level of risk.

Risk Matrix for UAS Operations at Smith College:

UAS Weight Class	< 250 g (.55lb)	250 g to 4.5 kg (.55lb - 10lb)	4.5kg to 25kg (10lb - 55lb)
<i>MacLeish Property</i>	<i>Low</i>	<i>Med-Low</i>	<i>Medium</i>
<i>Athletic Fields <u>or</u> Indoors</i>	<i>Med-Low</i>	<i>Medium</i>	<i>Med-High</i>
<i>Main Campus</i>	<i>Medium</i>	<i>Med-High</i>	<i>High</i>

The risk matrix above assumes that the specified areas are unoccupied or nearly unoccupied at the time of the UAS operation. Generally, UAS should not be operated near crowds such as sporting events, tours, concerts, or graduation. Operations over property not owned by Smith College should be mapped to the campus risk matrix as closely as possible when assessing the need for permissions and additional safety measures.

Generally, faculty and staff who have received authority to operate may operate UAS and directly supervise students operating UAS in the *Low* and *Med-Low* categories of the risk matrix.

UAS operations in the *Medium* and higher risk categories will be reviewed by the UAS review Committee. To assist the Committee with their review, operations in these categories will also require completion of a waiver [link to waiver form] detailing additional safety measures. These measures could include, for example, a tether, a netted enclosure, or test flights demonstrating safe outcomes if the UAS experiences loss of power, a lost communication link, or lost GPS signal.

It is anticipated that some operations, especially those in the ***High*** risk category, may not be permitted by Smith College.

- Any College employee, student, or unit providing a College-owned UAS to a third party for any purposes other than research or education, regardless if a fee is charged, needs first to receive approval through the Office of Compliance and Risk Management.
- In operating a UAS for purposes of recording or transmitting visual images, operators must take all reasonable precautions to avoid areas normally considered to be private. UASs should not enter onto, overfly, survey, or create a nuisance on any other private property except with written permission from the landowner.
- Use of UAS must comply with any other applicable College policies.

Definitions

- Smith College Property** – Buildings, grounds, and land that are owned by Smith College or controlled by Smith College via leases or other formal contractual arrangements to house ongoing College operations.

- **Unmanned Aircraft Systems (UAS)** - 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 necessary to operate the unmanned aircraft. Unmanned aircraft include quadcopters, multicopters, helicopters, drones, and fixed-wing models if these aircraft are used for any purpose other than recreation. FAA regulations apply to UAS regardless of size or weight, however, unmanned aircraft weighing less than 250 grams are not required to be registered with the FAA. Model aircraft and rockets, balloons, kites, and gliders that are not “capable of sustained flight in the air” are not regulated as unmanned aircraft, however, other FAA regulations may apply (e.g. FAR Part 107).
- **Model Aircraft** - Model aircraft are defined by the FAA remotely-piloted aircraft weighing less than 55 pounds and operated solely for recreation. The FAA allows students to use model aircraft for coursework, research projects, contests, and recreation, provided that faculty involvement is only incidental. Model Aircraft must follow all applicable FAA rules as well as safety guidelines from the Academy of Model Aeronautics (AMA) or equivalent FAA-recognized Community-Based Organization (CBO). Model aircraft operations that occur on Smith College property, utilize College resources, or that are part of College business (e.g., outreach) are additionally subject to the provisions of this policy document.

Sanctions

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

Legal prohibitions regarding physical presence on campus/trespassing and other legal action may also be pursued against third parties that operate UAS in violation of this policy.

Fines incurred by individuals or units that do not comply with this policy will not be paid by Smith College and will be the responsibility of those persons involved.