



Drone Procedure

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Drone Procedure

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Drone Procedure

I. Purpose

University of Northern Colorado (“University” or “UNC”) employees and students may use a drone in teaching and research. UNC and the Drone operator must comply with federal, state, and local laws, and Federal Aviation Administration (FAA) regulations regarding drones. Inherent risks in the operation of such equipment necessitate proper safety practices, additional insurance protections, and requisite oversight and authority for the operation of a drone on UNC property, at UNC sponsored events, or offsite in support of UNC business, research, and teaching activities.

Launching or landing aircraft on university property, or flying over it, creates risks for the institution and community, for several reasons:

- Campus is in a populated area within Greeley and the population and building density of the campus is high, creating safety risks to persons and property;
- Aircraft takeoff and landings and the noise associated with them generally create a distraction and have the potential to interfere with instruction and research;
- Many aircraft require licenses that UNC does not possess; and
- Aircraft may pose other unacceptable risks to the community including invasion of privacy, unauthorized solicitations, distracted driving, and more.

The use of a drone can make significant contributions to research, academic, and marketing activities of the University. Additionally, aerial photography with a drone can potentially assist in land management, athletics, law enforcement, and other support functions. However, the operation of a drone poses safety hazards to persons and property and can result in legal liability; therefore, drones use must be carried out only by those with proper training, certification, and authorization. Anyone operating (or assisting in operating) a drone that takes off from, lands on, or flies over University property, or on or over other property for University-sanctioned activities, wherever situated, must comply with this policy.

II. Scope

This policy applies to the operation of all drones on or above University property by persons including, but not limited to, UNC employees (including faculty, administrative professionals,

staff, volunteers), students, people acting under the direction and control of the University such as vendors or independent contractors, and visitors.

This policy also applies to the operation of drones on or above non-University property, in support of University-sponsored or sanctioned activities.

Emergency landings and landings for emergency support (e.g. Flight for Life) are not governed by this policy.

III. Authorization and Enforcement

Risk Management and Environmental Health and Safety (EHS) Departments of the University will monitor this procedure. Risk Management and EHS will review/approve/deny drone requests. The UNC Police Department (UNCPD) is responsible for enforcing this procedure. Risk Management, EHS, and UNCPD will consult with UNC General Counsel as necessary regarding questions of interpretation and enforcement.

The University of Northern Colorado maintains the authority to "ground" or suspend operations of any drone that is not compliant with FAA regulations, this policy, or presents a danger to the university community or property.

Any person who operates a drone in violation of federal, state, local laws, this policy, or any other University policy may be subject to criminal prosecution and/or disciplinary action. Any damage/injury to person and/or property is the responsibility of the drone operator. Unauthorized or improper use of a drone may also subject the responsible persons to civil or criminal liability. Fines or damages incurred by individuals or units for legal violations will not be paid by UNC.

Civil and criminal penalties may apply for failure to register a drone. Those penalties are on a sliding scale based on the circumstances of the situation and may include a formal warning to monetary fines and/or prosecution.

IV. FAA Regulations

The FAA classifies drones into three types:

- Public Operations - Governmental
- Civil Operations - Non-Governmental
- Model Aircraft - Hobby or recreation only

Registration Requirements are:

- 13 years of age or older (if the owner is less than 13 years of age, a person 13 years of age or older must register the drone)
- A U.S. citizen or legal permanent resident

- For foreign operators, FAA will consider the certificate issued to be a recognition of ownership rather than a certificate of U.S. aircraft registration.

Registration is required for all drones, except those that weigh 0.55 pounds (250 grams) or less and are flown exclusively under the Exception for Recreational Flyers. **In no case is a UNC employee operating a Drone in the course of their employment considered “recreational flying”.**

Additional information and the on-line registration may be obtained at https://www.faa.gov/uas/getting_started/register_drone/.

V. Procedure

1. Authorization to Operate an Aircraft (including Drones)
 - a. All members of the University community are personally responsible for complying with FAA regulations, state and federal laws, and university policies with respect to the operation of drones, whether the use is personal, recreational, or for University business or research.
 - b. Any University employee or student wishing to operate a drone as part of their University employment or as part of a University program must do so as either a public operation under a Section 333 exemption and Certificate of Waiver or a civil operation under Part 107. To request to use a drone the operator must comply with Section VIII.
 - c. For any University activity using drones in a foreign country, and when foreign nationals are involved in any University activity using drones, the Risk Management Department will assist in determining legal requirements and verifying that requirements have been met.
 - d. Any University employee or department purchasing a drone (or the parts to assemble a drone) or drone services with University funds, or funds being disbursed through a University account, including grant funds, must contact the Purchasing Department in order to assess licenses, FAA exemptions, or meet other applicable compliance requirements.
 - e. Recreational or hobbyist use of a drone or model aircraft on or over University property, not for a University-sponsored academic, research, or business purpose, is not permitted except for Registered Student Organization use as discussed below. On occasion, however, a drone may be used in connection with a course or project, where the operator is a student under the supervision of an instructor. In such cases, the use may qualify as hobbyist/recreational use and must comply with applicable FAA regulations for such use. Pursuant to FAA guidance issued May 4, 2016, faculty members may assist students with such uses, provided that:
 - No compensation is received by anyone in connection with the flight operation;
 - The student primarily retains operational control, the faculty member has all required FAA certifications and permissions to operate the drone, and the

faculty member's manipulation of the aircraft is incidental and secondary to the student's (e.g., the faculty member steps in to regain control in the event the student begins to lose control, to terminate the flight, etc.);

- The primary purpose of the course is not drone flight instruction; this is only one part of the curriculum.
- f. Registered Student Organizations (RSOs) in good standing may obtain University approval for operations of a drone on University property. The drone must be properly registered with the FAA and be labeled with the assigned drone registration number. Operation of the drone must always comply with law. The restrictions and requirements for operations, as set forth below, will apply to drone operation by RSOs.

VI. Prohibition on Use of Drones / Application for Exception

Restrictions and Requirements for Operation

In operating a drone for purposes of recording or transmitting visual images, operators must take all reasonable measures to avoid violations of areas normally considered private. Use of a drone must comply with any other applicable University policies. Use of a drone for video or electronic surveillance must comply with the UNC Policy on video and electronic surveillance.

All uses of drones must comply with the following:

- Do not use a drone to monitor or record areas where there is a reasonable expectation of privacy in accordance with accepted social norms. These areas include but are not limited to the interior of any building or anything seen through a building window. Flight/photography adjacent to campus residential facilities, apartments, and residence halls is not permitted. Exceptions, such as for building maintenance, may be authorized by the Risk Management and EHS Department.
- Do not operate or participate in the use of a drone while under the influence of alcohol or drugs, or in a reckless or careless manner.
- Unless express permission is received from the FAA, Risk Management, and EHS, a drone shall not be operated directly over persons who are non-participants in the flight operations.
- Do not fly a drone beyond line of sight. Use of a Visual Observer is permitted in accordance with the applicable regulation; however, use of a Visual Observer does not relieve the Remote Pilot in Command ("Remote PIC") and any other person operating the flight controls of the responsibility to maintain a clear VLOS at all times.
- Do not fly a drone inside a building, or use it to see inside a building. Exceptions may be authorized by the Risk Management and EHS.
- Law enforcement officers conducting a drone flight for law enforcement purposes are exempt, but must comply with all other applicable FAA regulations.

Operation of a non-owned drone requires approval from Risk Management. All non-owned drone operators must provide liability insurance (See Section VIII.), along with proof of FAA certification.

Requests to launch, fly and/or land a drone on University property will be reviewed based on the following criteria:

- a. Relationship to a specific University program or approved activity;
- b. Justification of need to take off or land on campus as opposed to local aircraft support facilities;
- c. Whether or not the operator(s) have all required licenses, permits, and clearances to operate the aircraft as proposed;
- d. Whether or not appropriate insurance coverage is in place, in acceptable types and amounts, proof of which has been provided to the university; and
- e. Any other factor deemed pertinent by Risk Management or EHS Departments.

A Contractor's operation of a drone requires a contractual relationship. All non-owned drone operators must provide liability insurance in the type and amount described in the contract along with proof of FAA certification.

VII. Request for Exception Process

A Drone Request for Exception Form (Appendix A) must be submitted by the requesting party to UNC Environmental Health and Safety Department a minimum of five (5) days prior to the date of the drone operation request. The requested operation of the drone must:

- Comply with all sections of this Policy.
- The requesting party must obtain prior approval from Risk Management and EHS.
- A University owned or commercial drone must comply with FAA regulations by obtaining and producing a "333 Exemption" prior to use on campus. (See www.faa.gov).
- A drone operator who is not faculty or staff must provide a certificate of insurance naming The Trustees of The University of Northern Colorado as an additional insured.
 - Commercial General Liability Insurance written on ISO occurrence form CG 00 01 10/93 or equivalent, covering premises operations, fire damage, independent contractors, products and completed operations, blanket contractual liability, personal injury, and advertising liability (state anticipating HIPAA coverage) with minimum limits as follows:
 - 1) \$1,000,000 each occurrence;
 - 2) \$2,000,000 general aggregate.
 - 3) \$2,000,000 products and completed operations aggregate;
 - 4) \$50,000 for any one fire;
 - 5) Per Project General Aggregate Limit; and
 - 6) A waiver of subrogation in favor of UNC.
- All required insurance documentation and proof of compliance with Part 107 pre-flight requirements including a remote pilot airman certificate with a small drone rating or be under the direct supervision of a person who holds a remote pilot certificate (remote

pilot in command). and subject to immediate takeover of flight controls by the certified pilot.

- Operators must comply with all Part 107 requirements and restrictions, as listed in the FAA's Summary of Small Unmanned Aircraft Rule (Part 107).
- A contract operator shall be accompanied by a representative of the University at all times unless prior arrangements have been made.
- The approved application must be on hand during flight operation.
- The drone must be operated in a responsible manner.
 - submit a Drone Request for Exception Form (Appendix A).
 - Drone operations must be approved in advance (see Section VIII).

VIII. Exemptions

The following departments/individuals are exempt from the Drone Request for Exception Form process but must comply with all Federal, State, local laws and UNC policy and regulations. These departments/individuals shall contact UNC Police Communication Center (970) 351-2245 each time before and after launching a drone on campus.

Department / Individual

- Marketing and Creative Services – Ryan Moore
- Facilities Management Planning and Construction
Certified Contractors (comply with general liability insurance)
- UNC Police Department and Emergency Agencies

IX. Definitions

Aircraft: Any vehicle, machine or device capable of being introduced into flight, including, but not limited to, fixed wing airplanes, gliders, ultra-lights, helicopters, lighter-than-air ships such as blimps and hot air balloons, drones, model aircraft, and rockets.

Campus or University Property: Land and buildings owned or controlled by the University, including property leased by or on behalf of the University or licensed for the University's use.

Civil Operations: Any drone operation that is not a "public operation" (as defined below) is a civil operation. All drone operations for commercial purposes, including for University business, teaching and research (with some exceptions noted in this policy), are civil operations.

Non-owned Drone: A drone that is operated on or over University property as part of a University-sanctioned activity but is not owned by the University.

Part 107: FAA Final Rule on Operation and Certification of Small Unmanned Aircraft Systems, 49 CFR Part 107. This rule governs civil/commercial operations of small drones (less than 55 lbs., total weight including the aircraft) by a Remote Pilot in Command or under the direct supervision of a certified Remote Pilot. For purposes of this policy, all drone operations at UNC are governed by Part 107 conducted under a Section 333 exemption and COA (below). A few examples of operations that may be conducted under Part 107 include (but are not limited to):

- a. Flying a drone over a UNC construction site to inspect it;
- b. Flying a drone for a research project;
- c. Flying a drone in connection with a class assignment.

X. Contacts

Question about this procedure can be directed to:

Glenn Adams, Director of EHS Department; (970) 351-1149; glenn.adams@unco.edu

Blaine Nickeson, Chief Risk Officer; (970) 351-3966; blaine.nickeson@unco.edu;



Drone Request for Exception Form

The use of a drone on campus is prohibited, unless this Drone Request for Exception Form is submitted to the University and written approval of the request is granted pursuant to the University of Northern Colorado ("University" or "UNC") Drone Procedure. UNC Police Department or other campus personnel may request to see an approved copy of this form to ensure that a person has permission to operate a drone. Any person operating a drone on University property after receiving permission to do so must have a copy of the approved request form with them during drone operations (unless exempt from exception form).

A person operating a drone (whether or not a Request for Exception has been approved by the University) is responsible for all damage/injury to person(s) and/or property caused by the operation of the drone. The operator of the drone must comply with all Federal, State, local laws and University procedures and policies that apply to the operation of a drone. **Submit a copy of the Pilot License with this form.**

Requestor Name (Please Print):	Requestor Phone Number:	Today's Date:
Requestor Email Address	Campus Affiliated Organization: <input type="checkbox"/> Yes <input type="checkbox"/> No	UNC Department / Company Name Requesting:
Name of Operator (Please Print):	Pilot Cell Phone Number:	Pilot Company:
UNC Affiliated Pilot: <input type="checkbox"/> Yes <input type="checkbox"/> No	Pilot Certification Number:	Drone Registration Number:
University Owned Drone: <input type="checkbox"/> Yes <input type="checkbox"/> No	Drone weighs less than 55 pounds: <input type="checkbox"/> Yes <input type="checkbox"/> No	Drone Make and Model (ex. DJI Phantom 4)
Date(s) of Drone Operation:	Beginning Time of Operation:	Ending Time of Operation:
Event Location (Be specific):		Event will be conducted (check all that apply): <input type="checkbox"/> Indoors <input type="checkbox"/> Outdoors

Describe the intended use and purpose of the drone:
Describe the outlined flight path? (Include buildings, areas of campus, etc.)

By submitting this application, the requesting party affirms that they understand and agree to submit all the information and the provisions of the University Drone Procedure.	
Requestor Signature	Date
The permit must be completed and submitted to the Environmental Health and Safety Department a minimum of five (5) days prior to the proposed usage.	

Time of operation may be flexible depending on safe operating conditions. Notify UNC Police Department at (970) 351-2245, within 30 minutes before the flight.

Signed and Authorized Drone Request for Exception Form shall be on-hand during flight operations.

RISK MANAGEMENT and EHS USE ONLY		
Risk Management Review (Print Name):	Risk Management Approval Signature	Date:
Additional Requirements		
EHS Review (Print Name):	EHS Approval Signature	Date:
Additional Requirements		

Confirm environmental conditions comply with FAA standards
[\(https://www.faa.gov/uas/recreational_fliers/where can i fly/airspace restrictions/\)](https://www.faa.gov/uas/recreational_fliers/where_can_i_fly/airspace_restrictions/)

Any questions about FAA rules and regulations visit <https://www.faa.gov/uas>