

POLICY CONCEPT FORM

Name and UO Title/Affiliation:	Andre Le Duc, Vice President and Chief Resilience Officer Deborah Butler, Associate Vice President for Campus Services and COS, Finance and Administration
Policy Title & # (if applicable):	Unmanned Aircraft Systems Policy
Submitted on Behalf Of:	Jamie Moffitt, Senior Vice President for Finance and Administration & CFO
Responsible Executive Officer:	Senior Vice President for Finance and Administration & CFO

SELECT ONE: ☐ New Policy ☒ Revision ☐ Repeal

Click the box to select

HAS THE OFFICE OF GENERAL COUNSEL REVIEWED THIS CONCEPT: ☒ Yes ☐ No

If yes, which attorney(s): Carson Campbell

GENERAL SUBJECT MATTER

Include the policy name and number of any existing policies associated with this concept.

This policy governs the use of Unmanned Aircraft Systems (UAS), including drones and model aircraft, on or above University of Oregon property and at university-sponsored events. It outlines operational requirements, approval procedures, and compliance obligations under federal, state, and university regulations.

Associated Policy: Unmanned Aircraft Systems Policy – Policy Number: IV.05.07

This policy is supported by related procedures maintained by Safety & Risk Services and may intersect with other university policies such as export controls, campus safety, and departmental drone use guidelines

RELATED STATUTES, REGULATIONS, POLICIES, ETC.

List known statutes, regulations, policies (including unit level policies), or similar related to or impacted by the concept. Include hyperlinks where possible, excerpts when practical (e.g. a short statute), or attachments if necessary. Examples: statute that negates the need for or requires updates to an existing policy; unit level policy(ies) proposed for University-wide enactment; or existing policies used in a new, merged and updated policy.

Federal Regulations

FAA Part 107 – Small UAS Rule

Governs commercial drone operations including licensing, operational limitations, and safety protocols. <https://www.faa.gov/newsroom/small-unmanned-aircraft-systems-uas-regulations-part-107>

49 USC § 44807 – Special Authority for Certain Unmanned Systems

Replaces the former Section 333 exemption and provides authority for specific UAS operations. https://www.faa.gov/uas/advanced_operations/certification/section_44807

Export Administration Regulations (EAR) and International Traffic in Arms Regulations (ITAR)

Apply to UAS equipment, software, and data involving foreign nationals, international collaboration, or federally funded research.

https://www.pmddtc.state.gov/ddtc_public?id=ddtc_kb_article_page&sys_id=24d528fddbf c930044f9ff621f961987

FY2021 National Defense Authorization Act (NDAA), Section 848

Effective December 22, 2025, prohibits use of UAS equipment manufactured by certain companies (e.g., DJI, Autel) in federally sponsored research or in connection with federal funds. <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.congress.gov/116/plaws/publ283/PLAW-116publ283.pdf>

State Law

Oregon Revised Statutes (ORS) Chapter 837 – UAS Regulations

Addresses privacy, law enforcement use, and public safety concerns related to drone operations. ORS 837.300–837.390 https://oregon.public.law/statutes/ors_837.310

University Policies

UAS Procedures (Safety & Risk Services) (Updated link pending see attachment)

Operational procedures for requesting approval and conducting UAS activities on campus or at university-sponsored events.

Export Controls Policy (Office of the Vice President for Research and Innovation)

<https://research.uoregon.edu/manage/export-controls>

Physical and Environmental Security <https://policies.uoregon.edu/vol-4-finance-administration-infrastructure/ch-5-public-safety-risk-services/physical-and>
May be invoked in response to unauthorized drone operations or violations of UAS policy.

Unit-Level Drone Use Guidelines

Departments with existing drone use protocols (e.g., Journalism, Athletics) may be subject to integration or alignment with this university-wide policy.

STATEMENT OF NEED

What does this concept accomplish and why is it necessary?

This policy update is necessary to reflect changes in federal regulations, including the repeal of FAA Section 333 and the implementation of 49 USC § 44807 and Part 107 requirements. It also incorporates new federal restrictions on foreign-manufactured UAS equipment, clarifies university procedures, and aligns with current campus safety, privacy, and export control standards. Updating the policy ensures continued legal compliance and operational clarity for all university-affiliated drone use.

AFFECTED PARTIES

Who is impacted by this change, and how?

University employees, students, volunteers, vendors, and visitors must follow updated approval procedures and comply with new federal restrictions on drone equipment. Faculty and researchers are impacted by export control requirements tied to federally funded projects. Procurement staff must verify compliance before purchasing UAS equipment. Safety & Risk Services must revise oversight processes to reflect these changes.

CONSULTED STAKEHOLDERS

Which offices/departments have reviewed your concept and are they confirmed as supportive? (Please do not provide a list of every individual consulted. Remain focused on stakeholders (e.g. ASUO, Office of the Provost, Registrar, Title IX Coordinator, etc.).)

Name	Office	Date
Carson Campbell	Office of General Counsel	9/5/25
Andre Le Duc	Safety and Risk Services	9/24/25
Jason Wade	University Police Department	9/24/25
Ken Kato	Location Innovation Lab	9/24/25
Steve Stuckmeyer	Environmental Health and Safety	9/24/25
Lisa Taylor	Risk Management and Insurance	9/24/25
Krista Dillion/Lindsey Salfran	Emergency Management	1/28/25 & 9/24/25
Ethan Mapes	Export Controls Office/OVRI	9/5/25
Paula Ellison	Transportation Services	9/5/25
Jett Nilprabhassorn	University Communications	9/5/25
Devon Shea	Athletics	9/5/25
Mike Harwood	Campus Planning and Facilities Management	9/5/25

Unmanned Aircraft Systems Policy

Policy Number:

IV.05.07

Reason for Policy:

The purpose of this Policy is to ~~support facilitate~~ the ~~safe and compliant use of operation of~~ unmanned aircraft systems ("UAS") ~~and model aircraft for teaching and research; while mitigating associated risks and ensuring compliance with~~ ~~mitigate any risks to individuals and organizations potentially affected by UAS and model aircraft operations; and ensure compliance with~~ University campus policies, federal, state, and local laws, as well as regulations and contracts.

Entities Affected by this Policy:

This Policy applies to all University of Oregon employees, students, volunteers, vendors, and all visitors (invitees and licensees) who operate or seek to operate all aircraft, including UAS and model aircraft, on or above any University property or at any University ~~sponsored event,~~ event conducted under a university contract or agreement.

~~Emergency landings and landings for emergency support (e.g., Life Flight) are not governed by this Policy. Nor are UAS flights by University of Oregon employees unrelated to their University employment and not on or above any University property or at any University sponsored event.~~

Commented [CC1]: And campus policies?

Commented [LT2R1]: Added

Commented [CC3]: The title is the "Unmanned Aircraft Systems policy". We might want to reconsider if the policy is more broadly applied than that.

Commented [LT4R3]: @Carson Campbell I will check in with Andre on this, thank you for flagging.

Commented [LT5]: Define & add geographic info on procedures (feedback from SRS folks)

Commented [LT6]: This seems implied and perhaps is not needed to be defined in the policy?

Responsible Office:

For questions about this policy, please contact the ~~Office of the Vice President for Finance and Administration at 541-346-3003~~. ~~Safety & Risk Services~~ at safety@uoregon.edu

Website Address for this Policy:

<https://policies.uoregon.edu/vol-4-finance-administration-infrastructur...>

Enactment & Revision History:

29 March 2017 - Approved by the university president

Policy:

OVERVIEW

~~UAS and model aircraft offer significant opportunities for teaching and research and provide the University community with valuable experiences in a wide range of disciplines. At the same time, UAS and model aircraft present unique health and safety risks, environmental risks, regulatory issues, and privacy concerns that must be balanced with the University's other missions. The University of Oregon is committed to providing an academically vigorous, safe, and secure environment for all individuals. Inherent risks in operation of UAS and model aircraft necessitate proper safety practices, privacy restrictions, insurance protections, and requisite oversight of and authority for operation of UAS and model aircraft on University property, University sponsored events, or offsite in support of the University's research, teaching, and business activities.~~

Operation of UAS and model aircraft is regulated by the Federal Aviation Administration ("FAA") and federal, state, and local laws. The University ~~shall~~ has developed procedures to comply with this Policy and other University policies implicated by the use of UAS as well as all applicable statutory and regulatory expectations governing the operation of UAS and model aircraft, and to reduce risks to safety, security, and privacy.

Commented [CC7]: ...and other University policies implicated by the use of UAS...?

Any UAS or model aircraft operation by University employees, students, volunteers, vendors, and all visitors (invitees and licensees) must be approved in advance by Safety and Risk Services' ("SRS") Chief Resiliencey Officer (or their designee) through the UAS Procedures referenced below. All such operations must also comply with all federal, state, and local laws and University policies.

~~GUIDELINES~~Policy

Commented [LT8]: This section could be shortened to be in line with other UO policies which would then point to the procedures page.

- ~~All UAS and model aircraft operations must comply with applicable federal, state, and local laws, including FAA regulations.~~
- ~~Prior written approval is required for any UAS or model aircraft operation on university property or in connection with university activities.~~
- ~~Operations must not infringe on privacy, safety, or university operations.~~
- ~~Emergency aircraft operations (e.g., Life Flight) are not subject to this policy.~~
- ~~UAS equipment, software, and data may be subject to U.S. export control laws, including the Export Administration Regulations (EAR) and International Traffic in Arms Regulations (ITAR); operators must consult with the University's Export Controls Office prior to any international collaboration, data sharing, or use involving foreign nationals, international shipping of UAS equipment, purchase of UAS equipment from foreign manufacturers, or use of UAS equipment from foreign manufacturers in conjunction with federally funded research grants, cooperative agreements, contracts, or otherwise.~~

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~~Effective December 22, 2025, UAS equipment manufactured by certain companies in a country of concern are prohibited from being purchased or used in federally sponsored research, and in connection with federal funds. This prohibition includes UAS equipment manufactured by DJI and Autel. The Export Controls Office must be contacted prior to the purchase of any foreign manufactured UAS equipment.~~

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Oversight

~~I. Office of the Vice President for Research and Innovation ("Research and Innovation") and Safety and Risk Services ("SRS"), will assist with processing requests for UAS and model aircraft activities consistent with applicable federal, state, and local laws and regulations and University of Oregon (UO) policy requirements. Safety and Risk Services (SRS) is responsible for reviewing and approving UAS operations and maintaining related procedures.~~

~~II. FAA regulations, federal, state, and local laws, and applicable UO policies must be followed in conjunction with any UAS or model aircraft activities.~~

~~III. Operation of UAS or model aircraft on any UO property or at any UO sponsored event is prohibited unless approved in advance by SRS' Chief Resiliency Officer or their designee. SRS will seek review and input from Research and Innovation, the UO Police Department (UOPD), the Office of the General Counsel (OGC), and other stakeholders familiar with a particular request.~~

Commented [LT9]: Should we consider moving this to procedures? and use the first bullet point to indicate all federal laws should be followed. @Ethan Mapes Thoughts?

Commented [EM10R9]: This sounds fine to me, though I'd want to ensure this point isn't missed by faculty before they purchase drones. See the point I've added to the above bullet about purchasing from foreign manufacturers.

Commented [LT11R9]: During Meeting with the committee - Ethan mentioned it would be okay to move this to procedures. I'd like to get SRS feedback on including in the policy. This rule potentially could change over time... which may require us to update the the big P policy.

Commented [EM12R9]: I'm fine with either as the above point captures the same message. I did add one more detail to the above point concerning use of foreign manufactured UAS equipment in conjunction with federal funds.

Commented [LT13R9]: Confirming SRS comfortable with leaving this in the big P policy.

Commented [LT14R9]: Moved to procedures

Commented [LT15]: OVPRI hasn't historically been involved in the policy.

Commented [LT16]: If updating policy, I think this area could be simplified. However, I'm also fine with it as is.

IV. Do not use UAS or model aircraft to monitor or record activities where there is a reasonable expectation of privacy:

A. Using a UAS or model aircraft to record or observe areas such as camps or campus settings where minors are cared for or taught is prohibited unless expressly approved by SRS in advance:

B. UAS and model aircraft must not be used for unapproved recordings of any campus events or performances, or for any unlawful purpose:

C. Do not use a UAS or model aircraft to see inside a building unless expressly approved by SRS in advance:

V. Do not operate or participate in the use of UAS or model aircraft while under the influence of drugs or alcohol, or in a reckless or careless manner:

VI. Do not operate UAS or model aircraft directly over non-participants in the flight operations unless expressly approved by FAA and UO:

VII. Do not fly a UAS or model aircraft beyond line of sight:

VIII. Under FAA guidelines, Temporary Flight Restrictions (TFRs) may be implemented on UO property or at any UO sponsored event, which prohibit any type of UAS or model aircraft operations from taking place (e.g., UO sporting events). As needed, UO may issue additional "No Drone Zones" on UO property or at any UO sponsored event, which prohibit any type of UAS operations from taking place. (For example, the FAA prohibits all aircraft at or below 3,000 feet within a 3-mile radius of any stadium with a seating capacity of 30,000 or more people when there is a NCAA Division I football game occurring and one hour before and after the game.)

IX. The operation of UAS by UOPD and/or the UO Emergency Operations Center (EOC) may be exempt from this policy based on the determination of emergency needs. During such operations UOPD will follow internal department protocols consistent with federal, state, and local laws:

X. UAS Operated for Civil/Commercial or Public Operations/Government Purposes on Behalf of the University of Oregon:

A. Any University employee wishing to operate a UAS as part of their University employment, or any student, volunteer, vendor, or visitor (invitee or licensee) wishing to operate a UAS on behalf of UO, must do so under a Section 333 Exemption and Certificate of Authorization (COA) issue by the FAA, or a civil operation under Part 107.:

B. UAS owned by the UO of Oregon and used on behalf of the UO for Civil/Commercial or

Commented [KD17]: do these exist?

Commented [JW18R17]: No

Public Operations/Government purposes will be operated under the authorization of the FAA, applicable federal, state, and local laws, and the UAS policy and procedures:

1. This authorization could take the form of an FAA Section 333 Exemption or Part 107 approval (for civil/commercial use) or a Public Use COA (for public/government use), and will be limited to a specific location and outline the conditions, parameters, and limitations of flight operations:

2. Those operating UAS under an FAA Section 333 Exemption or Part 107 approval must also review and be aware of all FAA specifications, and file for any necessary amendments in advance:

3. UAS owned and operated by the UO and used for Civil/Commercial or Public Operations/Government purposes on behalf of the UO must also comply with any applicable state law requirements, such as UAS registration with the Oregon Department of Aviation:

4. UOPD will work in conjunction with Research and Innovation, OGC, and local law enforcement jurisdictions for any UO-sponsored events that do not occur on UO property:

XI. UAS Operated for Hobby or Recreational Purposes ("Model Aircraft") on University Property or at a UO-Sponsored Event:

A. All UAS operated for a hobby or recreational purpose on UO property or at a UO-sponsored event are considered "model aircraft" for purposes of this policy:

B. Individuals may operate model aircraft for recreational purposes, provided that they obtain prior approval from SRS under the processes outlined in the UAS procedures and follow federal, state, and local law and UO policies, including but not limited to FAA guidelines and the Student Conduct Code. Furthermore, the model aircraft remote pilot must comply with all federal, state, and local laws, UO policies, and the additional safety requirements listed in Section II.B of the UAS procedures:

C. Any remote pilot of a model aircraft flown for hobby or recreational purposes on UO Property or at a UO-sponsored event found to be operating in an unsafe manner may, in addition to the consequences listed below ("Accountability"), be prohibited from additional flights on UO Property or at UO-sponsored events:

XII. Data recorded from operation of a UAS on behalf of UO, including images, video and audio recordings, shall be maintained in accordance with university records retention policies and schedules and UAS procedures:

ACCOUNTABILITY

Commented [LT19]: The FAA Section 333 Exemption is no longer in effect. It was repealed and replaced by Section 44807 under the 2018 FAA Reauthorization Act 1. Current Section 333 exemption renewal requests are processed under the new Special Authority for Certain Unmanned Systems (49 USC 44807)2. For most drone operations, you would now need to comply with Part 107 regulations. Part 107 licenses do not expire, but you must complete recurrent training every 24 months to maintain your certification

Commented [LT20R19]: @Carson Campbell Could you review this section?

Commented [LT21]: I'm not sure that this is accurate... Or that it is needed to be spelled out in the policy

Commented [KD22R21]: agreed, wouldnt it be the same process as above for a UO event not on our property?

I. Any individual or organization found to be operating a UAS or model aircraft on UO property or at a UO-sponsored event in violation of any federal, state, or local law, or applicable UO policies or procedures (including the UAS Policy and procedures) will subject the responsible persons to discipline in accordance with applicable UO policies and Collective Bargaining Agreements ("CBAs"), an order to cease operation of the aircraft, and/or an order to leave the premises or property owned or controlled by UO. Violators will be held accountable for their actions, including but not limited to:

A. Volunteers are subject to reprimand or loss of volunteer status.

B. Students are subject to the Student Conduct Code.

C. Employees are subject to corrective action up to and including termination pursuant to applicable UO policies and CBAs.

D. All are subject to the consequences resulting from the violation of federal, state, and local laws, which may include civil or criminal liability.

II. Violations will be considered in future UAS and model aircraft requests.

III. Legal prohibitions regarding physical presence on campus, trespassing, and other legal action may also be pursued against individuals and organizations that operate UAS or model aircraft in violation of this policy and its procedures.

IV. UO is not responsible for any damage resulting to a UAS or model aircraft. Fines or damages incurred by individuals that do not comply with the UAS policy and/or procedures will not be paid by UO, and the remote pilot(s) will be responsible for any property damage or losses resulting from the operation of UAS or model aircraft.

Individuals or organizations that operate unmanned aircraft systems (UAS) or model aircraft in violation of this policy, applicable procedures, or any federal, state, or local laws may be subject to disciplinary action, removal from university property, and legal consequences. Violations may impact future UAS approval requests. The University of Oregon is not responsible for damage to UAS or model aircraft resulting from non-compliant operations; individuals are responsible for any resulting property damage or liability. University-owned UAS damaged during approved operations must be reported to Safety and Risk Services and handled through the university's internal claims process.

PROCEDURES to be placed on separate website and no longer imbedded in Policy.

Policy owners: Safety and Risk Services

Related resources:

Commented [LT23]: What is UOPDs current process for asking unauthorized drone operators? (More of a question versus update)

Commented [KD24R23]: is its only uopd who can ask them to stop? Seems like we'd want some others to have authority to ask them to stop as well. UOPD can always be the next call if they don't heed the direction of the university official.

Commented [LT25R23]: Note for Lisa - Cut section down to 1-3 lines and link to other policies related to accountability.

Commented [JL26]: direct links added

Link to UAS Procedures (see attachment will be posted online)

Link to SRS UAS <https://safety.uoregon.edu/drones>

~~usage~~ <https://safety.uoregon.edu/drones>

Link to Export Controls <https://research.uoregon.edu/manage/export-controls>

<https://research.uoregon.edu/manage/export-controls>

Link to FAA <https://www.faa.gov/uas> <https://www.faa.gov/uas>