

THE CITADEL
The Military College of South Carolina
171 Moultrie Street
Charleston, SC 29409

MEMORANDUM
NUMBER 6-402

30 August 2019

UNMANNED AIRCRAFT SYSTEMS (UAS) “DRONE” POLICY

1. PURPOSE

The operation of unmanned aircraft systems including drones and model aircraft is regulated by the Federal Aviation Administration (FAA) and relevant state law. This policy establishes procedures to govern all operation of unmanned aircraft systems (UAS), commonly referred to as drones, above or on Citadel property; these procedures also apply to Citadel employees and students operating UAS in any other location as part of their college employment or as part of college activities.

2. REFERENCE

[14 CFR Part 107 Small Unmanned Aircraft Systems](#)

3. DEFINITIONS

- A. Campus Property: Buildings, grounds, and land that are owned by The Citadel or controlled by The Citadel via leases or other formal contractual arrangements to house ongoing Citadel operations.
- B. Director of Environmental Health and Safety (DEHS): The Citadel’s Director of Environmental Health and Safety, The DEHS is responsible for receiving and reviewing requests for operation of UA, UAS, and model aircraft over campus property.
- C. Model Aircraft: an unmanned aircraft that is (1) capable of sustained flight in the atmosphere; (2) flown within visual line of sight of the person operating the aircraft; and (3) flown for hobby or recreational purposes. (See 14 CFR 101.41) For purposes of this policy, model aircraft are considered “unmanned aircraft” and a component part of an “unmanned aircraft system.”
- D. Remote Pilot Certificate: the certification issued by the FAA to operators of unmanned aircraft and unmanned aircraft systems, in accordance with 14 CFR Part 107.
- E. Third party operator: an individual who desires to operate a UA or UAS over campus property who is not a Citadel employee or student.

- F. Unmanned aircraft (UA): an aircraft operated without the possibility of direct human intervention from within or on the aircraft; also known as drones, quadcopters, and quadrotors.
- G. Unmanned Aircraft Systems (UAS): the unmanned aircraft and all of the associated support equipment, control station, data links, telemetry, communications and navigation equipment, etc., necessary to operate the unmanned aircraft.

4. POLICY

The Citadel will allow the operation of small unmanned aircraft, small unmanned aircraft systems, and model aircraft in compliance with [14 CFR Part 107](#). The Citadel prohibits the operation of any unmanned aircraft that does not qualify as a “small unmanned aircraft” or “model aircraft” pursuant to Part 107.

A. Remote Pilot Certificate.

1. Any Citadel employee or student wishing to operate a UAS anywhere in the United States as part of his or her employment or as part of an approved college program, and any Third Party Operator desiring to operate a UAS anywhere over campus property, must have a valid Remote Pilot Certificate issued by the FAA or operate under the supervision of a Citadel employee with a valid Remote Pilot Certificate.

Citadel faculty, staff, employees or students desiring to operate a UAS use in a foreign country must consult with the DEHS and other appropriate school officials to identify and comply with local requirements.

2. Exceptions. The Office of the Senior Vice President may grant an exception to individuals without a Remote Pilot Certificate who desire to operate a UA, UAS, or model aircraft over campus property upon execution of the UAS Flight Application ([Annex A](#)). Exceptions to the requirement of having a Remote Pilot Certificate will only be granted on an exceedingly rare basis and only as a result of highly persuasive reason. Individuals operating under this exception must complete all requirements in Paragraphs B and C, as applicable, and obey all regulations in Paragraph D.

B. UAS Registration. All UASs over .55lbs must be registered with the FAA and must provide proof of registration on request.

C. All Citadel faculty, staff, employees or students desiring to operate a UAS on campus must complete the UAS Flight Application ([Annex A](#)) at least 2 weeks (preferred) or a minimum of 72 hours prior (only in extenuating circumstances) to the day of launch. Provide the completed application to Citadel Public Safety.

- D. All Third Party operators must obtain prior approval by completing the UAS Flight Application ([Annex A](#)) form. All third party requests must be coordinated through the DEHS, The Citadel Department of Public Safety (PSAF), and the Office Communication and Marketing (OCM) at least 2 weeks prior to the day of launch. Provide the completed application to Citadel Public Safety.
1. Third party operators must provide proof of insurance naming The Citadel as an additional insured and must agree to indemnify and hold the school harmless for any and all claims or harm to individuals or damage to Citadel property.
 2. Third party UAS operators must have a point of contact from a sponsoring Vice President or equivalent department.
 3. Third party operators must submit an [Institutional Planning Council \(IPC\) form](#) for IPC consideration.
- E. Rules for Operations During Flight. For a full list of the federal rules, see [14 CFR Part 107](#). The Citadel highlights the following rules for use of UAS and model aircraft on campus (not intended to be an all-inclusive list of 14 CFR Part 107):
1. All operators of UA, UAS, and model aircraft must notify The Citadel Department of Public Safety (843-953-5114) the day of launch and must have their Remote Pilot Certificate, as appropriate, on their person at all times.
 2. Operators of UAS and model aircraft must comply with all other applicable Citadel policies, including but not limited to [Memorandum 7-1, Photography, Filming, and Videography on Campus](#).
 3. Unmanned aircraft (UA) shall not create a hazard to college-owned or controlled property, the college community or the public at any time. UA may not be operated in a way that disrupts instruction or unduly affects the environment of people in or passing through a common space, those working or studying within a building, or those entering, exiting or otherwise making their way about a facility.
 4. UA/UAS will not be operated above 400 feet at any time.
 5. UA/UAS may not be operated inside college buildings without permission. Areas of operation will be marked in hallways and exits indicating UA in use.
 6. The operator will maintain a line of sight with UA/UAS always.
 7. UA/UAS will always yield right of way to other aircraft (e.g. Helicopters traversing area).
 8. UA/UAS will only be flown during daylight hours.

9. UA/UAS will never be flown under the influence of drugs or alcohol.
10. UA/UAS shall not be used 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 restrooms, locker rooms, individual residential rooms, changing or dressing rooms, and health treatment rooms.
11. UA/UAS shall not be used to monitor or record residential hallways, residential lounges, or the insides of any campus facilities.
12. UA/UAS shall not be used to monitor or record sensitive institutional or personal information which may be found, for example, on an individual's workspaces, on computer or other electronic displays.
13. UA/UAS may not be operated above public open areas such as but not limited to the Parade and practice Fields, barracks or Johnson Hagood Stadium when more than 10 people are present within the area of operation that are not part of a class, research team, demonstration activity, mission requirement, or pre-approved event.
14. UA/UAS may not be operated above public open-air events, in or about public venues or above thoroughfares, including but not limited to roadways, sidewalks, bike paths and pedestrian paths.
15. On the day of approved UA/UAS flight, the campus primary office of responsibility will notify Public Safety dispatch of the location, time, and duration of UAS flight(s) by calling (843) 953-5114.

5. COMPLIANCE

Failure to comply with this policy will directly impact the safety and mission of The Citadel and its campus facilities. Failure to comply also increases privacy concerns. Any violations of college policies by an employee will be dealt with in accordance with applicable college policies and procedures, which may include disciplinary actions up to and including termination.

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 or damages incurred by individuals or units that do not comply with this policy will not be paid by The Citadel and will be the responsibility of those persons involved.

6. NOTES

A. Dates of Official Enactment and Amendments:

Approved by the Senior Vice President for Operations and Administration on 30 August 2019

B. Responsible Department:

Department of Public Safety

C. Responsible Official:

Chief, Department of Public Safety

D. Cross References:

[Memorandum 2-003, Alcohol and Other Drugs Policy](#)

[Memorandum 7-1, Photography, Filming, and Videography on Campus](#)

7. RESCISSION

N/A.

8. REVIEW

Review this policy on a biennial basis.

FOR THE PRESIDENT:

OFFICIAL

//Signed, TGP, 30 August 2019//
THOMAS G. PHILIPKOSKY
Colonel, USAF, Retired
Senior Vice President for Operations and
Administration

Attachments:

[Annex A](#): Unmanned Aircraft System (UAS) Flight Application