

OPS.08 sUAS (Small Unmanned Aerial Systems) Deployment for UMPD

08.01 Purpose:

- A. The purpose of this policy is to establish and define guidelines for:
 1. The use and deployment of a small Unmanned Aerial or Aircraft System (sUAS) on the University of Maryland (UMD) campus by or in coordination with UMPD; and
 2. For the storage, retrieval, and dissemination of data captured by the sUAS while it is engaged in UMPD specific and focused public safety and law enforcement activities at UMD (to include UMPD community outreach and engagement activities).
- B. The use, or coordination of use, of sUAS by UMPD contributes to:
 1. The agency's mission of service to the university community and protection of life & property;
 2. Enforcement of the law, by detecting & deterring criminal activity, civil unrest, and terrorist activity on the UMD campus;
 3. Assisting first responders in enhancing public safety;
 4. Increasing the efficiency of search & rescue operations; and
 5. Supporting first responders in situations which would benefit from an aerial perspective, and enable responders to detect dangers that could otherwise not be seen.
- C. Any use of a sUAS by or in coordination with UMPD will be in strict accordance with constitutional & privacy rights, and strictly adhere to the current Federal Aviation Administration (FAA) regulations.

08.02 Definitions:

Aircraft - A device that is used or intended to be used for flight in the air. This includes sUAS.

Certificate of Authorization (COA) - An authorization issued by the FAA to a sUAS operator which grants permission to fly within specific boundaries and perimeters. Commonly referred to as a "waiver".

Federal Aviation Administration (FAA) - The national aviation authority of the United States, with powers to regulate all aspects of American aviation, including the operation of sUAS.

Forward Looking Infrared (FLIR) - refers to the technology used to create an infrared image of a scene. Some sUAS utilize a high-definition camera, a FLIR system, or both to provide real-time situational awareness. The ability to provide this aerial view will enhance public safety without placing additional responders at risk while increasing public safety and aid in the safe apprehension of suspects or during fire department or emergency medical services (EMS) operations.

Image - Any capturing of sound waves, thermal, infrared, ultraviolet, visible light, or other electromagnetic waves, odor, or other conditions existing on or about real property in this state, or an individual located on that property. Imagery may include data about people, organizations, events, incidents, or objects as well as metadata.

Line of Sight (LOS) - The Remote Pilot-in-Command (RPIC) or the Visual Observer (VO) can see, unaided, the sUAS under their control during flight.

Remote Pilot-in-Command (RPIC) - The RPIC operates a sUAS platform in a safe and secure manner according to all local, state, and federal regulations. The RPIC shall be a current Part 107-certified pilot but need not be the person manipulating the controls. The RPIC

shall have the ultimate authority as to when the sUAS is launched or landed and what missions or objectives can or cannot be conducted based on training and available aviation resources. The RPIC has ultimate authority over any on-scene commander to terminate the flight operation. No member of the command staff, unified command, or other member of the UMPD sUAS team may overrule the decision of the RPIC related to the sUAS operation.

sUAS Team - Comprised of authorized Pilot and Non-Pilot members, including those in a multijurisdictional or jurisdictional team, who are specifically trained and equipped to deploy as requested, and include any combination of the RPIC, remote pilot, or VO(s).

sUAS Non-Pilot Team Member - Non-licensed pilot member working with the sUAS Team which may support in a variety of capacities as needed (e.g., uniformed police officer, security, visual observer, logistics, etc.)

sUAS Remote Pilot Team Member - The members on the sUAS Team operating the aircraft are licensed FAA Part 107 pilots.

Unmanned Aerial or Aircraft System (sUAS) - An unmanned aerial or aircraft of any type, including all of the associated support equipment, control station, data links, telemetry, communications, and navigation equipment necessary to operate the aircraft, which is capable of sustaining directed flight, whether preprogrammed or remotely controlled (commonly referred to as an Unmanned Aerial or Aircraft Vehicle (UAV), and all of the supporting or attached systems designed for gathering information through imaging, recording, or any other means. Unmanned Aerial or Aircraft Systems (sUAS) are also referred to as Uncrewed Aerial or Aircraft Systems.

Training Portfolio - A compilation of records that shall consist of, but not limited to, the members' training, proficiency, certifications, qualifications, and any related information pertaining to the sUAS program.

Visual Observer (VO) - A trained person who assists the RPIC and the person manipulating the flight controls of the sUAS (if that person is not the Remote Pilot-in-Command) to see and avoid other air traffic or objects aloft or on the ground.

08.03 Privacy:

- A. The use of the sUAS potentially involves privacy considerations. Absent a warrant or exigent circumstances, operators & observers shall adhere to FAA flight regulations and shall not intentionally record or transmit videos or images of any location where a person would have a reasonable expectation of privacy (i.e., residence, dorm rooms, inside buildings, indoor enclosures).
- B. Operators and observers shall take a reasonable precaution to avoid inadvertently recording or transmitting videos or images of areas where there is a reasonable expectation of privacy. Reasonable precautions can include:
 1. Deactivating or turning imaging devices away from such areas or persons during sUAS operations; or
 2. Turning off all video or camera recording equipment until it arrives at its target location so the sUAS is unable to record any images unrelated to the operation.
- C. Use of vision enhancement technology (e.g., thermal, forward looking infrared (FLIR), or other imaging equipment not generally available to the public) is permissible in viewing areas only where there is no protectable privacy interest, during a rescue mission, or when in compliance with a search warrant or court order.
- D. The sUAS shall be configured to be readily identifiable by the public by the appropriate use of markings or other designations approved by the agency.

- E. Each deployment of the sUAS shall be properly documented. Such documentation shall include, at a minimum, the date, operator(s), location, flight time, and purpose of the deployment.
- F. sUAS video and camera systems under the control of UMPD should be classified as a Security Operations Center (SOC) camera and consistent with the same rules, policies, procedures, data retention, statistics, and legal requirements currently in use by UMPD's SOC video monitoring systems under UMDPS Manual Section **2.1400 Video Monitoring & Recording, 2.431 Impartial Policing**, and **2.362.10 Procedural Safeguards (Criminal Intelligence)**.
- G. Training and demonstration flights of the sUAS shall be conducted over areas under agency control or a public use area.

08.04 sUAS Program Coordinator

The program coordinator will report to the Information Services & Community Outreach Bureau (ISCOB) Commander through the Special Events/Operations Commander, and will ensure that policies and procedures conform to current laws, regulations, and best practices. The program coordinator will have the following additional responsibilities:

- A. Coordinating the FAA COA application process and ensuring that the COA is current.
- B. Ensuring that all authorized operators and required observers have completed all required FAA and agency-approved training in the operation, applicable laws, policies, and procedures regarding the use of the sUAS.
- C. Maintaining a complete, accurate, and up to date sUAS Training Portfolio.
- D. Ensuring operational procedures and guidelines governing the deployment and operation of a sUAS are followed, per section **08.05 sUAS Operational Procedures**.
- E. Overseeing the procedure for fully documenting all missions.
- F. Coordinating a sUAS inspection, maintenance, and record-keeping procedure to ensure continuing airworthiness of a sUAS, up to and including its overhaul or life limits.
- G. Coordinating procedures to ensure that all data intended to be used as evidence are accessed, maintained, stored, and retrieved in a manner that ensures its integrity as evidence, including strict adherence to chain of custody requirements. Electronic trails, including encryption, and authenticity certificates and date & time stamping shall be used as appropriate to preserve individual rights, and to ensure the authenticity & maintenance of a secure evidentiary chain of custody.
- H. Controlling & facilitating access to images & data captured by the sUAS.
- I. Recommending program enhancements.
- J. Providing quarterly program reports to the Special Events/Operations Commander, or as requested from the Office of the Chief.

08.05 sUAS Operations Procedures:

- A. Only authorized operators who have completed the required training shall be permitted to operate the sUAS. Only sUAS team members will be in the vicinity of the sUAS during operations, except as precluded by emergent operational circumstances.
- B. A UMPD sUAS team should be comprised of team member roles to perform the following operational functions: RPIC, VO, and on-scene security & logistics. These roles will be shared among a minimum of (2) team members.
- C. The sUAS team are not to be distracted and should not be approached by non-flight relevant personnel during operations except in event of an emergency or imminent threat to the team.
- D. All sUAS operations will be conducted under the FAA Regulations, part 107, unless a COA is obtained and otherwise specifies

conditions for operation.

- E. Requests to deploy the sUAS shall be approved in situations that do not fall under section **08.06 sUAS Prohibited Use** by the Chief of Police or his designee.
- F. Unless prior approval is given by the Chief of Police or his designee, or if the sUAS is being utilized for evidence gathering purposes or in connection with a law enforcement investigation, there will be no storage of images or videos (live feed only).
- G. Videos/images from sUAS deployments will be used primarily for management of incidents, in particular as it relates to deploying & directing resources, and monitoring large scale incidents or events where police resources are not present, unavailable, or unable to monitor, and will be consistent with UMDPS Manual Section **2.1400 Video Monitoring & Recording, 2.431 Impartial Policing**, and **2.362.10 Procedural Safeguards (Criminal Intelligence)**.
- H. The public may be notified of sUAS deployment by the UMPD Public Information Officer (PIO) consistent with UMDPS Manual Section **2.450 Public Information & Media Relations**.
- I. UMPD may utilize signage to notify the public in areas that will be monitored by sUAS under the direction and in cooperation with UMPD, or, if possible, notification may be made over a police vehicle loud speaker, notifying the public in the immediate area that sUAS will be active in the area.
- J. The location being utilized for sUAS should be as secure as possible. The area selected and utilized should be restricted to only the personnel directly involved in the sUAS operation, be evaluated for adequate space and clearances in order to assemble, launch, operate, and recover the sUAS, and area of operations are limited to the incident only.
- K. Flames, smoke, heat, clouds, hazardous materials, and water from hoses are very likely to cause instability in the aircraft, melt or warp blades, and/or cause damage or crash. Avoid hazardous conditions when possible or take preventative measures to mitigate property damage or personal injury.
- L. The following is a list of missions in which the sUAS may be utilized (any other missions not listed must be approved in writing by the Chief of Police):
 - 1. Enhance Situational Awareness: to include but not limited to:
 - a) Demonstrations or protests (either planned or unplanned);
 - b) Crowd management for large events (planned or unplanned) to include but not limited to sporting events or athletic contests.
 - c) Large event security operations (i.e., VIP support); or
 - d) To assist decision makers (i.e., incident command staff, first responders, university administration) in understanding the nature, scale, and scope of an incident, or in planning & coordinating an effective response.
 - 2. Search & Rescue: in support of public safety operations for the following: missing persons, or recovery operations (including, locating and recovering victims).
 - 3. Scene Documentation: in support of viewing or documenting other major incident scenes (i.e., disaster management, incident response, large-scale public safety investigations).
 - 4. Emergency or Disaster Response & Management: to support incidents involving: hazardous material (Hazmat); chemical, biological, radiological, nuclear, & explosive (CBRNE); explosive ordnance disposal (EOD) missions; or in response to specific requests from PGFD authorities for actions or preventative measures to protect life & property.
 - 5. UMPD Development: to capture aerial digital multimedia evidence to enhance department training, and/or community outreach demonstrations of the sUAS for the purposes of educating the public.
- M. A Command Information Summary (CIS) will be completed for all sUAS deployments in UMD airspace by UMPD (including training & demonstrations) according to UMDPS Manual Section

2.442.10.

- N. The sUAS Program Coordinator for flight operations is responsible for completing Safety Event Reporting (Accident Reporting) to the FAA in accordance with 14 CFR Part 107.9.
- O. All sUAS equipment owned by or under the control of UMPD will be:
1. Used, maintained, and operated in accordance with all manufacturer recommendations, to include but not limited to: maintenance, repairs, and modifications.
 2. Used, maintained, and operated in accordance with all current certified sUAS operator flight training and refresher training, to include but not limited to: flight and pre-flight preparation, flight actions, and flight emergencies and accidents.
 3. Securely housed in limited access area.

08.06 sUAS Prohibited Use:

- A. sUAS equipment shall not be used:
1. In an unsafe or reckless manner, or in violation of FAA rules.
 2. For the purposes of facial recognition or for the collection of audio or voice recordings to include “lip reading”.
 3. To conduct random surveillance activities not related to tactical operations or criminal investigations.
 4. For any commercial or profit-based purposes.
 5. For any non-public safety or non-UMPD activities, training, or operations, including outside of UMPD’s primary jurisdiction, unless for training purposes or with the written approval of the Chief of Police.
 6. For routine police patrol operations.
 7. In conditions that exceed the manufacturer’s recommended limitations, including but not limited to range, ceiling, wind strength, payload strength, and battery charge.
 8. Outside of any of the sUAS team members current training or abilities.
 9. Beyond visual line of sight (BVLOS) unless a current waiver is in place. The RPIC is not permitted to “daisy-chain” observers to extend the line of sight.
 10. To target a person based solely on individual characteristics unrelated to a public safety incident or investigation, such as, but not limited to: race, color, age, ethnicity, national origin, religion, disability, gender, gender identity, sexual orientation, physical characteristics, socioeconomic status, or individuals experiencing housing insecurity.
 11. To harass, intimidate, or discriminate against any individual or group.
 12. To conduct personal business of any type.
- B. The sUAS shall not be weaponized, nor armed with any projectiles, explosives, aerosols, jammers, or sonic devices.

08.07 sUAS Team Member Eligibility & Selection

- A. Interested agency members with (2) or more years of public safety experience shall submit a memorandum to their appropriate chain of command, a copy of which will be forwarded to the Special Events/Operations Commander, ISCOB Commander, and sUAS Program Coordinator for consideration.
- B. Officers must have evaluation ratings of “Meets Expectations” or better in all categories of at least the most recent evaluation as an initial qualification for the agency’s sUAS program.
- C. Opportunities to participate in the sUAS program will be announced to all sworn personnel via e-mail and filled through the conduct of selection processes consistent with **1.436.15 Specialized Assignments**.
- D. The conduct of sUAS program activities is considered an ancillary assignment for sworn officers accepted into the sUAS program.
1. sUAS team officers may be assigned by their patrol squad or

event commanders to conduct sUAS operations as necessary to fulfill the mission of the agency and goals & objectives of the event or activity.

2. sUAS team officers may be required to split their duty shifts between patrol & sUAS operations based on agency needs, maintenance requirements, or weather conditions.
- E. Maintain a physical and mental condition to safely fly sUAS in accordance with the physical and cognitive standards required under 14 CFR Part 107.17 and 14 CFR Part 107.61. These standards are designed to determine eligibility. Per §107.17 Medical Condition, no person may manipulate the flight controls of a sUAS or act as a RPIC, VO, or direct participant in the operation of the sUAS if he or she knows or has reason to know that he or she has a physical or mental condition that would interfere with the safe operation of the sUAS.
- F. Qualifying applicants will be invited to participate in the assessment process. The order of the assessment will be at the discretion of the sUAS Program Coordinator. The assessment process will consist of an oral interview and a review of the applicant’s resume, personnel file, training file, and Internal Affairs file.
- G. Every sUAS team member must be able to obtain RPIC certification.
- H. Applicants will be evaluated by certain criteria, which include:
1. Recognized competence and ability, as evidenced by performance.
 2. Demonstrated good judgment and understanding of the critical role of a UMPD sUAS Team Member.
 3. Special skills, training or appropriate education as it pertains to this assignment.
 4. Commitment to the UMPD sUAS Team, realizing that the additional assignment may necessitate unusual working hours, conditions, and training obligations.
 5. Ability to pass all certifications and requirements of the FAA to operate sUAS.

08.08 Removal from the sUAS Program:

- A. Officers who are no longer certified through the FAA.
- B. Officers who fail to maintain their skills & abilities as evaluated by certified instructors or the rules & regulations of the FAA will be required to undergo remedial training and successfully demonstrate skills proficiency to regain their standing with the sUAS program.
- C. Officers may request to be removed from the program at any time based on their written request through their chain of command to the sUAS Program Coordinator and Special Events/Operations Commander, for review and final determination by the ISCOB Commander.
- D. Officers who, within one year of their original training, voluntarily drop out of the program or are dropped from the program because of willful non-participation may be required to reimburse the agency for specially purchased uniform articles that cannot be reissued.
- E. The sUAS Program Coordinator may request the ISCOB Commander to temporarily or permanently remove officers from the program:
1. For willful non-participation;
 2. For failing to maintain Part 107 license in accordance with FAA recertification standards and requirements;
 3. For failing to maintain “Meets Expectations” or better in all evaluation categories;
 4. Because of illness or injury which prevents safe sUAS operations;
 5. For negligent or reckless behaviors or accidents while operating the sUAS or as a member of the sUAS team; or
 6. Other, objectively-based reasons for the good of the program, the agency, or involved officers.