



**Risk Management Subcommittee Agenda
January 9, 2023 - 9:00 AM**

[Join Zoom Meeting](#)

Meeting ID: 859 2713 7496 Passcode: 918278

Committee Members

Rusty Clark
Martin Fregoso
Carolyn Cramer
Don Ogden
Kevin Roche

SIG Staff

Kelli Hanson
Gabrielle Daniel
Jaxine Anderson
Amy Gonnella
Tuesday Taylor

Consultants

Scott Rhymes, Newfront
Mo Preston, Newfront

Call to order

AB361 Statement: "The state of emergency continues to directly impact the ability of the members to meet safely in person, therefore virtual meetings will be held until the state of emergency is lifted or conditions improve for in-person meetings."

Action Items (for recommendation to the Executive Committee)

1. Approve agenda for January 9, 2023
2. Approve minutes from November 2, 2022
3. Drone Policy #2011 Amendment

Discussion Items:

1. Activity Matrix
2. Site visits/trainings



Risk Management Subcommittee Minutes Wednesday November 2, 2022, 1:30 PM

Committee Members

Rusty Clark
Martin Fregoso
Kevin Roche

SIG Staff

David Rawe
Gabrielle Daniel
Jaxine Anderson
Nancy Mosier
Amy Gonnella
Tuesday Taylor
Kelli Hanson
Kirstie Miller
Nancy Mosier

Consultants and Guests

Mo Preston, Newfront
Sheryl Sharp
Audrey Kilpatrick
Barbara Patterson

Called to order at 1:30 pm

Approval of the November 2, 2022 agenda

Motion by Kevin Roche, second by Martin Fregoso, unanimous approval

Approval of the August 2, 2021 minutes

Correction: Minutes are from August 2, 2022.

Motion by Martin Fregoso, second by Kevin Roche unanimous approval

Discussion Items: No action taken, for discussion purposes only

1. Activity Matrix

- a. Kelli Hanson reviewed data on activities inquiries/approvals have greatly increased this FY. Request to color code specific activities and not the event (i.e. field trips), changing less risky activities to green. Rocklin and Western Placer will provide SIG with a list of recommended changes. Some feedback includes that it is too much work for lower risk activities as well as setting up more master contracts.

2. RM Member Grants/Anonymous Reporting App

- a. Some members are using different anonymous reporting apps. Members using STOPit are underwritten by safety funds from Safety National. Catapult recently purchased STOPit – we will wait to see how they move forward.

3. SAM Prevention Training with Diane Cranley

- a. Recordings were unusable due to background noise picked up on in-room mic. Waiting to hear if Diane can record and upload to PSW. Boundary policies were shared. Feedback included finding a way to balance SAM prevention training with connecting with/supporting students. Mo Preston relayed she can provide onsite inspections to help educate members on areas of concern.

Next Meeting: January 9, 2023, at 9:00 a.m.

Meeting adjourned at 2:44 p.m.

Unmanned Aircraft Systems (Drone) Policy

- COVERAGE REQUIRES STRICT ADHERENCE TO THE BELOW GUIDELINES, AS WELL AS PRIOR APPROVAL.
- IF THE DISTRICT PLANS TO HIRE A “COMMERCIAL” OPERATOR (e.g., for photographs, surveying, etc.), THERE ARE ADDITIONAL MANDATORY REQUIREMENTS.

Mandatory Prior Review and Approval by SRIMG is Required

Please allow a minimum of 14 days advance notice for SIG to review

***Mandatory Guidelines for Recreational and Educational
District Use of UAS***

Information

Drones have many potential positive uses for both staff and students throughout SRIMG. These guidelines are intended to promote the responsible, safe, and legal use of UASs over District properties. While it is the responsibility of the drone user to understand and follow all government regulations, which will not be reprinted herein, this document will provide a brief synopsis of actions and information required by the prospective drone user prior to operating a UAS over District property or using a District-owned drone anywhere.

Risks

The use of drones poses unique risks, many of which are self-evident, such as the possibility of injury due to malfunction or misuse, or property damage to others and the drone itself. However, there are also risks which may not be quite so obvious. These include the possibility of charges of invasion of privacy (e.g., flying over someone’s backyard), hitting a fire sprinkler when flown indoors causing water damage, and potential personal liability to the operator for damages/injury caused by illegal use (such as flying an unregistered drone, or flying without the proper government issued piloting certification).

General Safety Guidelines

The following must be adhered to in order to operate any drone over District property, or to use a District-owned drone anywhere:

- Complete a District “Drone Use Application” (See a school district representative for form)
- Register your drone
- For commercial users, obtain the proper Remote Pilot Airman or Remote Pilot in Command Certification, and pertinent FAA certificates of authorization or waivers
- Notify all airports within 5 miles of your intended use. Document your notification.
- Always conduct and document a pre-flight inspection, to include specific aircraft and control station systems checks.
- Fly your drone at or below 400 feet
- Keep your drone within your line of sight

- Be aware of and compliant with FAA Airspace Restrictions
- Respect privacy (i.e., do NOT fly over private property)
- Never fly near other aircraft, especially near airports
- Never fly over people, public events, or stadiums when people are present
- Never fly near emergencies such as fires or other types of disasters
- Never fly indoors (with the exception of “mini-drones” under 0.55 lbs/8.8 ozs. with little or no potential to cause property damage or injury)
- Never fly under the influence of drugs or alcohol
- Never fly in excess of 100 mph
- Be aware of local ordinances and regulations, including signage
- Understand the risks to you, to others, and to the district and take steps to reduce those risks.

Which Type of Drone Operator are You?

Drones can be operated legally only under one of two FAA regulatory categories, and you are responsible for assuring you follow all regulations under the appropriate option, else you are operating illegally. Note that if you operate a drone for District purposes in an illegal manner, the district’s insurance may not be able to cover you or defend you should a liability claim or lawsuit be filed against you, and you may be personally subject to significant government fines. Thus, the importance of knowing which regulatory option you are operating under and understanding (and following) all regulations of that option.

Option One: Flying for hobby or recreation use ONLY.

This option is described under FAA Special Rule for Model Aircraft (Section 336).

Option Two: Flying for commercial use

This option is described under the FAA’s Small UAS Rule (Part 107).

Below is a brief summary of each user type (as it relates to District use) to help you decide which option your intended use fits under... but remember, it is your responsibility to study, understand, and follow FAA regulations before any use for District purposes or over District property.

Option One – Hobby/Recreational Use (Section 336)

- Student use of a registered drone as a verifiable component of science, technology, aviation, or television/film production coursework.
- The operator, whether student or not, is NOT compensated, either directly or indirectly, for the operation of the drone
- If hobby/recreational only use, the drone is operated in accordance with a community-based set of safety guidelines and within the programming guidelines of a nationwide community-based organization
- A teacher’s use of a drone may ONLY be incidental to a student’s coursework use. Such use may include, for example, regaining control of the UAS following a student’s loss of control. Teacher use cannot include any full flight demonstration, nor off-site practice flights using a District-owned UAS, since a teacher’s use must remain secondary and incidental to the student’s operation of the UAS at the time in order to maintain Hobby/Recreational status.

Option Two – Commercial Use (Part 107)

- Anyone receiving any sort of compensation for the use of the drone (with the narrow exception being as noted in Option One above for a teacher’s use). For example, a facilities department employee using a drone to survey a new construction site, or a Communications Dept. employee using a drone to film a school activity, are both considered commercial users, as they are being paid a salary as part of their job to operate the drone.
- Any visitor, vendor, or contractor flying over District property who is being compensated in any way, by anyone, to operate the drone.

Requirements for each type of user

For Hobbyist/Recreational Users

1. UAS must be under 55 lbs.
2. UAS must be properly registered with the FAA and properly marked with the registration number. (see <https://faadronezone.faa.gov/#/> for detailed information)
3. The operator must pass the Recreational UAS Safety Test (TRUST)
 - See https://www.faa.gov/uas/recreational_fliers/knowledge_test_updates/ for links to authorized test centers.
4. Use of the UAS must be for “recreational or educational” purposes only under 14 CFR Part 107 (Small UAS Rule). Recreational use does NOT include:
 - Inspections
 - Taking pictures or video of football games
 - Any other activity that would benefit a company or non-profit
 - Taking pictures or video of anything that would go on a website
5. The Operator must be proficient in the UAS’s operation.
6. Follow FAA recognized safety guidelines for operation of UAS
7. UAS flight must be within the line of sight of the operator or a designated spotter at all times.
8. Give way and do not interfere with manned aircraft
9. No flights above 400 feet. Remain below and clear of any surrounding obstacles.
10. Do not operate the drone in a dangerous manner such as interfering with emergency response or law enforcement activities
11. Do not operate the drone while under the influence of drugs or alcohol
12. UAS must be in a sound operating condition.
13. No flights are ever to come within 25 feet of any person.
14. No flights over or into crowds or near moving vehicles.
15. No flights in any occupied athletic stadium, field or sports competition while events are underway.
16. No flights at night or in adverse weather conditions.
17. No flights over sensitive infrastructure such as power stations, water treatment facilities, correctional facilities, government facilities, etc.
18. No flights into or over private property; more specifically, adjacent to District sites.
19. No video or photographs of persons where there would be a reasonable expectation of privacy.

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20. Do not drop anything from an UAS.
21. Remain clear of and do not interfere with manned aircraft operations.
22. You must contact the airport or control tower, prior to flight within 5 miles of an airport.
23. Comply with all local laws and ordinances regarding the use of an UAS.
24. Districts should also check current FAA Regulations.
25. Only current students, and Teachers fitting the requirements of use noted in Option One above, may operate a drone as a Hobbyist/Recreational user over District property
26. No public or visitor Hobbyist/Recreational use is allowed over District property, with the exception of an approved, non-commercial expert demonstration
27. A District "Permit for Use of Unmanned Aerial System" must be submitted to, and approved by, SRIMG prior to the use of any drone over District property (or use anywhere of a District-owned UAS).
- 24.

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For Commercial Users

- The UAS must be registered with the FAA if it weighs over 0.55 pounds (8.8 ounces) A District "Permit for Use of Unmanned Aerial System" must be submitted to, and approved by, SRIMG prior to the use of any drone over District property (or use anywhere of a District-owned UAS)
- All UAS users must follow the Drone Safety Guidelines listed below
- All commercial users must maintain a Remote Pilot Airman or Remote Pilot in Command Certification, and pertinent FAA certificates of authorization or waivers
- Vendor/Contractor or commercial use of a UAS over district property is allowable if contracted by the district for a specific business use, a vendor agreement/contract and appropriate insurance certificate is on file with SRIMG and an approved Permit for Use of Unmanned Aerial System is on file.

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~~Please note: Failure to secure prior approval from SRIMG will result in the application of a \$50,000 deductible in the event of a claim.~~

Educational Use Guidelines (adapted from BP 3515.21 Unmanned Aircraft Systems (Drones):

Permission may be granted to district employees and students for the use of drones only if the planned activity supports instructional, co-curricular, extracurricular, athletic, or operational purposes. Such uses may include, but are not limited to, instruction in science, technology, engineering, and math (STEM), the arts, or other subjects; maintenance of grounds and facilities; and campus security. When used for instructional purposes, there shall be a clear and articulable connection between drone technology and the course curriculum. Students shall only operate a drone on or over district property under the supervision of a district employee as part of an authorized activity.

Any person or entity requesting to operate a drone on or over district property, including a district employee, shall provide a description of the type of operation requested, flight location, date and time of the planned flight, anticipated duration, and whether photos and/or video will be taken. As applicable, the applicant shall also present a copy of his/her Certificate of Waiver or Authorization, or exemption issued by the Federal Aviation Administration.

Any person or entity, other than a district employee or student, who is requesting or operating a drone on or over district property shall agree to hold the district harmless from any claims of harm to individuals or property resulting from the operation of the drone and provide proof of adequate liability insurance covering such use.

Any person authorized to use a drone on district property shall sign an acknowledgment that he/she understands and will comply with the terms and conditions of the district's policy, federal law and regulations, state law, and any local ordinances related to the use of drones.

In determining whether to grant permission for the requested use of a drone, the Superintendent or designee shall consider the intended purpose of the activity and its potential impact on safety, security, and privacy. The decision of the Superintendent or designee shall be final.

When any use of drones is authorized, the Superintendent or designee shall notify the drone operator of the following conditions:

The operator is responsible for complying with applicable federal, state, and/or local laws and regulations, including federal safety regulations pursuant to 14 CFR 107.15- 107.51 which include, but are not limited to, requirements that the drone not be flown at night, above 400 feet in altitude, or over any people unless they are in a covered structure or stationary vehicle. The operator shall always maintain the visual line of sight with the drone.

The drone shall be kept away from any area reasonably considered private, including, but not limited to, restrooms, locker rooms, and individual homes,

The district reserves the right to rescind the authorization for use of drones at any time.

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Please note: Failure to secure prior approval from SRIMG will result in the application of a ~~\$50~~100,000 deductible in the event of a claim.

(Adopted: 4/27/16, TBD)

Unmanned Aircraft Systems (Drone) Policy

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- IF THE DISTRICT PLANS TO HIRE A “COMMERCIAL” OPERATOR (e.g., for photographs, surveying, etc.), THERE ARE ADDITIONAL MANDATORY REQUIREMENTS.

Mandatory Prior Review and Approval by SRIMG is Required
Please allow a minimum of 14 days advance notice for SIG to review

Mandatory Guidelines for District Use of UAS

1. UAS must be properly registered with the FAA and properly marked with the registration number. (see <https://www.faa.gov/uas/registration/> for detailed information)
2. The Operator must be proficient in the UAS's operation.
3. UAS must be in a sound operating condition.
4. UAS flight must be within the line of sight of the operator or a designated spotter at all times.
5. No flights are ever to come within 25 feet of any person.
6. No flights over or into crowds or near moving vehicles.
7. No flights in any occupied athletic stadium, field or sports competition while events are underway.
8. No flights at night or in adverse weather conditions.
9. No flights above 400 feet. Remain below and clear of any surrounding obstacles.
10. No flights over sensitive infrastructure such as power stations, water treatment facilities, correctional facilities, government facilities, etc.
11. No flights into or over private property; more specifically, adjacent to District sites.
12. No video or photographs of persons where there would be a reasonable expectation of privacy.
13. Do not drop anything from an UAS.
14. Remain clear of and do not interfere with manned aircraft operations.
15. You must contact the airport or control tower, prior to flight within 5 miles of an airport.
16. Comply with all local laws and ordinances regarding the use of an UAS.
17. Districts should also check current FAA Regulations.

Please note: Failure to secure prior approval from SRIMG will result in the application of a **\$50,000 deductible** in the event of a claim.

(Adopted: 4/27/16)

Activity Policy

Schools Insurance Group (SIG) is a self-insured risk pooling program formed by and tailored specifically for schools. As a member of this self-insured program, each member has a responsibility to identify and manage risk associated with school activities and events. Each event brings with it a unique set of risks and exposures. It is SRIMG's goal to support members in organizing and hosting safe activities and events for the enjoyment of students, staff, and the member's school community.

An activities matrix (Appendix A to this policy) has been developed to provide guidelines to assist SRIMG members in identifying safe and appropriate activities and events to host, as well as providing guidelines for safety and risk management protocol

Due to the risk associated with some activities and events, SRIMG will not provide coverage. Those events considered "red" in the activities matrix and are outlined below:

Activities Excluded by School Risk and Insurance Management Group (SRIMG)

1. Liability for damages arising out of the ownership or use of any **trampoline**.
2. Liability for damages arising out of the in-flight operations of **aircraft**.
3. Liability for damages arising out of the ownership, maintenance, operation, use of any **watercraft** owned, operated by or rented or loaned to a covered party.
4. Liability for damages arising out of the ownership, maintenance, operation or use of any motorized vehicle or watercraft while participating in any speed contest, or practice sessions.

There may be additional activities not indicated on the matrix that carry a level of risk that is not appropriate for SIG to cover, or for members to undertake. In these instances, SIG will work with Members to explore alternatives that are carry less risk. Members are advised to avoid "red" activities designated as carrying higher levels of risk.

The High Hazard classification of activities carries a higher level of risk but may be hosted by SRIMG members upon prior approval by SRIMG. These activities are designed as "orange" activities and are indicated as such on the activities matrix (Appendix A). There is an application process to obtain approval, and additional documentation will be required.

Members are requested to submit at least two weeks in advance of the activity or event all documentation required in order for SRIMG to approve.

Other activities and events with enhanced levels of risk are designed as “yellow” activities. This level of activity requires consultation with SRIMG staff to determine safe protocol and proactive risk management. These “yellow” activities are indicated in the activities matrix (Appendix A)

Remaining activities and events are designated as “green”, and are generally acceptable for members to organize as special events or fundraising efforts. Examples of “green” activities are indicated in the activities matrix (Appendix A).

Included in the Activities Matrix are conditions intended to support members in managing the risk associated with specific activities. These conditions are listed at the top of the matrix, and an “X” indicates whether a condition applies to an activity. An explanation of the conditions can be found in the Activities and Events Overview.

SRIMG understands it is impossible to identify every activity that may be organized or hosted by SRIMG members or their affiliated organizations with coverage through the SRIMG Auxiliary Organization Coverage Program*. In the event an activity is not listed in the activities matrix, consultation with SRIMG is required to determine levels of risk and proactive risk management protocol.

Higher Deductible Activities

Undertaking high risk activities will also trigger higher deductibles in the event there is damage or loss resulting from the event. These higher deductibles align with the colored tiers in the activities matrix (Appendix A) as follows:

“Red” activities: Activities in this category are not covered through SIG’s program. Alternate coverage should be purchased if members would like to host or organize activities that carry this extreme level of risk to protect against the high probability of accidents and/or injuries that may occur.

“Orange” activities: Member Deductibles are revised as follows:

1) With SRIMG approval – Double (2 times) a member’s general liability deductible;

OR

2) Without SRIMG approval - \$100,000 deductible

In addition, a safety meeting is required prior to the event to establish authority and contacts, discuss safety protocol, and communicate what to do in the event of an accident or injury.

Member Training

Training will be provided to SRIMG members annually to review the activities matrix (Appendix A), the tiered approach toward activity and event risk management, approval processes and additional documentation that is required, as well as suggested risk management conditions to facilitate safe and enjoyable events.

*The SRIMG Auxiliary Organization Coverage Program is available at the discretion of participating Property/Liability Program Member Agencies. The program allows enrolled auxiliary organizations to share their affiliated agency's General Liability coverage and limits. Enrollment is handled through SRIMG upon request and with approval from the participating Property/Liability Program Member agency.