



Governor Douglas A. Ducey

State of Arizona

Department of Homeland Security



Director Gilbert M. Orrantia

POLICY FOR PURCHASE OF SMALL UNMANNED AIRCRAFT SYSTEMS (SUAS)

Public safety personnel encounter challenging situations on a daily basis. Some of these challenges can be mitigated by use of modern technology, such as small unmanned aircraft systems (SUAS). The use of SUAS can provide opportunities for public safety personnel to secure our borders, investigate crime, mitigate threats, and overcome serious incidents while simultaneously lowering risk of injury and/or death to first responders.

In accordance with the Presidential Memorandum: *Promoting Economic Competitiveness While Safeguarding Privacy, Civil Rights, and Civil Liberties in Domestic Use of Unmanned Aircraft Systems* (February 15, 2015), *Grant Programs Directorate Information Bulletin No. 407a*, (January 19, 2017), *Grant Programs Directorate Information Bulletin No. 426* (November 1, 2017), and *Grant Programs Directorate Information Bulletin No. 438* (January 31, 2019); the process outlined below shall be followed to request grant funding for the purchase of SUAS with grants from Operation Stonegarden (OPSG), State Homeland Security Grant Program (SHSGP), and the Urban Area Security Initiative (UASI).

- 1) An agency requesting funds from OPSG, SHSGP, or UASI to purchase SUAS must submit an application (during the applicable application period) to the Arizona Department of Homeland Security (AZDOHS) outlining their request. Application must include a copy of agency's SUAS policy and procedures.
- 2) AZDOHS will conduct a review of the application to ensure it is within the scope of the grant and the equipment requested is compliant with the Approved Equipment List (AEL).
- 3) Applications deemed to be within the scope of the grant and in compliance with the AEL will be forwarded to the appropriate workgroup [i.e., Integrated Planning Team (IPT), Regional Advisory Council (RAC), or the Urban Area Security Initiative (UASI) workgroup] for their review and recommendation.
- 4) Should an agency be awarded grant funding, a **FEMA Waiver Request Package** must be submitted to AZDOHS within **120 days of award notification**.

FEMA Waiver Request Package shall include:

- a. Justification letter signed by head of agency (See attached for letter content.)
 - b. Requesting agency SUAS policy and procedures
 - c. Vendor quote
 - d. Subrecipient checklist for SUAS waiver request
- 5) AZDOHS will complete a cover letter and forward the entire packet to FEMA seeking the waiver.

SUAS Justification Letter Content

The requesting agency shall author an equipment justification letter to the Grant Program Directorate of FEMA. This letter shall be on department letterhead and signed by the head of the requesting agency. The equipment justification letter shall contain the information below.

Need and Impact
1. Explain why SUAS are needed and how using a SUAS best meets the requesting agency's need as compared to other options.
2. If applying for SHSGP or UASI funding, explain how the request for SUAS fits into the State Homeland Security Strategy (https://azdohs.gov/state-homeland-security-strategy).
3. If applying for Operation Stonegarden funding, explain how the use of the requested equipment will provide enhanced border security in support of U.S. Border Patrol (USBP) mission. <ol style="list-style-type: none"> a. Include Operation Order Number (Contact AZDOHS or USBP)
Policy and Procedures
1. Include terminology of existing policies and procedures to safeguard individuals' privacy and civil liberties <ol style="list-style-type: none"> a. This policy must be forwarded with the justification letter
2. Include assurance of trained pilots/operators of SUAS and identify the methodology the agency will use to operate the SUAS in accordance with FAA regulations. <ol style="list-style-type: none"> a. Section 333 Certificate of Waiver or Authorization (COA) b. 14 CFR 107 requirements
3. Describe how the SUAS will be used operationally. <ol style="list-style-type: none"> a. Include the response assets that will be deployed when using the requested SUAS b. Include how the SUAS will be utilized on a regular, non-emergency basis
4. Include acknowledgement that SUAS must be marked with an FAA registration number.
Equipment
1. Identify the grant program and funding year for the SUAS award. <ol style="list-style-type: none"> a. Include the Federal Award Identification Number (Found in the Award Notification letter)
2. Include the proposed SUAS type, model, and its compliance with FEMA AEL# 03OE-07-SUAS.
3. Describe any SUAS equipment accessories to be purchased and how it would be used to prevent or respond to a terrorism incident.
4. Include information that the SUAS meets requirements at takeoff (.55 - 55 lbs. including payload).
5. Detail the quantity of SUAS to be purchased and an itemized list of components. <ol style="list-style-type: none"> a. Include if the price is projected or a firm quote
6. Describe what safeguard measures will be taken to reduce cyber vulnerability/risk. <ol style="list-style-type: none"> a. Manufacturer's default access credentials (username, password) changed prior to use b. Completion of search related to SUAS manufacturer's cyber vulnerability/risk
7. Include an acknowledgement that all ongoing operational expenses and maintenance are the responsibility of the grantee or the local units of government and are not allowable under the grant.