



Illinois Department of Transportation

Memorandum

To: IDOT Staff; Consultant & Contractors

From: Clayton Stambaugh, MPA - Deputy Director of Aeronautics

Subject: Foreign-Made Unmanned Aircraft (UAS) Restrictions

Date: March 18, 2026

The *American Security Drone Act of 2023 (ASDA)*¹ and US Office of Management and Budget (OMB) Memo M-26-02 – *Ensuring Government Use of Secure Unmanned Aircraft Systems and Supporting United States Producers*² contain guidance associated with operation of certain foreign-made Unmanned Aircraft Systems (UAS, or drones) in support of federally-funded projects and activities. The guidance places restrictions associated with procurement, operation, and data processing of foreign UAS manufacturers listed by the Federal Acquisition Security Council (FASC).

IDOT has been consulting with the Federal Highway Administration (FHWA) on this topic. Recently, FHWA provided IDOT additional clarifications regarding use of FASC-prohibited UAS in support of federally-funded projects. FASC-prohibited UAS include many of the most popular foreign UAS manufacturers, such as DJI and Autel, among others.

To adhere to FHWA's recommendations, FASC-prohibited UAS are not permitted to be used in support of any IDOT projects that have a nexus to federal funding.

This not only applies to future procurements and projects, but also existing UAS that are FASC-prohibited, but were procured with, and/or are being operated using, non-federal (state) funds. Additionally, this applies to projects that currently do not include federal funding (i.e. some phase 1/2 work), but are likely to utilize federal funding in later phases.

This guidance extends to private (contractor/consultant) UAS that are FASC-prohibited.

The following actions are immediately required:

- IDOT personnel authorized to operate IDOT UAS:
Cease operation of foreign-made UAS on any project that has, or may have, ties to federal funding. Contact the IDOT staff member responsible for overseeing the project and the Division of Aeronautics to confirm 1) the project you intend to fly has no ties to federal funding, and/or 2) the IDOT UAS you intend to operate is not FASC-prohibited.

¹ <https://www.congress.gov/bill/118th-congress/senate-bill/473/text>

² <https://www.whitehouse.gov/wp-content/uploads/2025/11/M-26-02-Ensuring-Government-Use-of-Secure-Unmanned-Aircraft-Systems-and-Supporting-United-States-Producers.pdf>

- IDOT personnel responsible for overseeing federally-funded projects:
Inform contractors/consultants, as well as internal staff authorized to operate IDOT UAS, of this guidance. Do not allow UAS to be used on the project until you have coordinated with the Division of Aeronautics and have confirmed that 1) the project has no ties to federal-funding; and/or 2) the UAS operator confirms the UAS they intend to operate is not FASC-prohibited.
- 3rd party entities (Contractors/Consultants):
Please contact IDOT staff responsible for overseeing the project (Construction Resident Engineers, Project Manager, etc.), and the Division of Aeronautics to confirm 1) the project you intend to fly has no ties to federal funding, and/or 2) the UAS you intend to operate are not FASC-prohibited.

IDOT executive management understands this is more than an inconvenience. We fully recognize the significant and wide-ranging impact this will have on projects and workflows. IDOT's UAS enhance safety, increase efficiency, and routinely provide valuable data for many projects across multiple disciplines within the Department.

We are working with UAS subject matter experts within the Department, the FHWA, and multiple other State DOTs on this issue. Our collective goal is to resume beneficial UAS operations as quickly as possible. Be advised, however, we have been provided no timeline on a potential resolution, and as of now these restrictions are in place indefinitely.

If you have any technical questions, please email DOT.AERO.UAS@illinois.gov or you may contact me directly at Clayton.Stambaugh@illinois.gov.