

SMS for Part 121 Notice of Proposed Rulemaking (NPRM)

Safety Attribute Inspection (SAI) Data Collection Tool

8.1.1 Safety Policy

Revision#: 0 Revision Date: 7/19/2012

ELEMENT SUMMARY INFORMATION

Scope of Element:

Purpose (operator's responsibility): To develop and implement an integrated, comprehensive Safety Management System (SMS) safety policy for its entire organization appropriate to the size, scope, and complexity of their operation. The safety policy will define and commit the organization to achieving safety objectives and ensure compliance with Chapter I, Title 14 Code of Federal Regulations (CFR).

Objective (FAA's oversight responsibility): To determine if the operator's SMS safety policy:

- Meets all applicable requirements of Title 14 CFR,
- Is appropriate to the size, scope, and complexity of their operation.

Specific Instructions:

Questions contained in this element are designed to evaluate the operator's Safety Management System as stated in the "Scope of Element" section. This assessment includes questions designed to evaluate the inclusion of key elements in a robust safety management system. The intent is not that a single "No" answer necessarily equates to an unsafe condition or a regulatory violation. This information gives the PI the ability to perform an accurate bottom-line assessment of the operator's safety management system considering size/scope/complexity of the carrier.

SUPPLEMENTAL INFORMATION

Regulatory Requirements*:

5.3; 5.21; 5.23; 5.25; 5.27; and 5.95

Related CFRs & FAA Policy/Guidance:

Related CFRs:

121.135

FAA Policy/Guidance:

FAA Order 8900.1, Volume 16

AC 120-92 Safety Management Systems for Aviation Service Providers

*Based on: Notice of Proposed Rulemaking (NPRM) [Docket No. FAA-2009-0671; Notice No. 10-15] RIN 2120-AJ86 (NPRM)

SAI SECTION 1 - PROCEDURES ATTRIBUTE

Objective:

The questions in this section of the SAI will help verify that the operator's documented procedures identify who, what, when, where, and how those procedures are accomplished. These procedures must allow all personnel to perform their duties and responsibilities with a high degree of safety.

14 CFR part 121.135(a)(1)

Tasks

	The inspector shall accomplish the following tasks:
1	Review the information in the Supplemental Information Section of this SAI.
2	Review the duties and responsibilities for management and other personnel who accomplish the processes associated with this element.
3	Review the documentation of the processes associated with this element.

Questions

1.1	Does the certificate holder's safety management system have a safety policy component that is in accordance with 14 CFR, part 5, subpart B, Safety Policy? Note: This question is best answered after addressing all other questions within this component.	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.3 (a) (1)	
	Kind Of Question: Flag, Supplemental, Domestic	
1.2	Is the certificate holder's safety management system appropriate to the size, scope and complexity of their operations?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.3 (a)	
	Kind Of Question: Flag, Supplemental, Domestic	
1.3	Does the certificate holder's safety management system have a safety policy that includes at least the following minimum requirements: <ul style="list-style-type: none"> • The certificate holder's safety objectives, • A commitment of the certificate holder to fulfill the organization's safety objectives; • A clear statement to commit the necessary resources for implementation of the safety management system; • A safety reporting policy that defines requirements for employee reporting of safety hazards or issues; • A policy that defines unacceptable behavior and conditions for disciplinary action; and • An emergency response plan that provides for the safe transition from normal to emergency operations in accordance with the requirements of 14 CFR, part 5.27, Coordination of emergency response planning? 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable

	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.21 (a):	
	Kind Of Question: Flag, Supplemental, Domestic	
1.4	<p>Do the certificate holder's safety management processes require their safety policy be:</p> <ul style="list-style-type: none"> Signed by the accountable executive (described in §5.25); Documented and communicated throughout the certificate holder's organization; and Regularly reviewed by the accountable executive to ensure it remains relevant and appropriate to the certificate holder? 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.21 (b) thru (d)	
	Kind Of Question: Flag, Supplemental, Domestic	
1.5	<p>Does the certificate holder's safety management policy define accountability for safety to all organizational personnel, specifically:</p> <ul style="list-style-type: none"> The accountable executive (described in §5.25); All members of management in regard to developing, implementing, and maintaining SMS processes within their area of responsibility; and Employees relative to the certificate holder's safety performance? 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.23 (a) (1) (2) & (3);	
	Kind Of Question: Flag, Supplemental, Domestic	
1.6	<p>Does the certificate holder identify an accountable executive who, irrespective of other functions, satisfies the following:</p> <ul style="list-style-type: none"> Is the final authority over operations authorized to be conducted under the certificate holder's certificate(s); Controls the financial resources required for the operations to be conducted under the certificate holder's certificate(s); Controls the human resources required for the operations authorized to be conducted under the certificate holder's certificate(s); and Retains ultimate responsibility for the safety performance of the operations conducted under the certificate holder's certificate? 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.25 (a)	
	Kind Of Question: Flag, Supplemental, Domestic	
1.7	<p>Do the certificate holder's safety management processes require the accountable executive to accomplish the following:</p> <ul style="list-style-type: none"> Ensure that the SMS is properly implemented and performing in all areas of the certificate holder's organization; Develop and sign the safety policy of the certificate holder; Communicate the safety policy throughout the certificate holder's organization; 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable

	<ul style="list-style-type: none"> Regularly review the certificate holder's safety policy to ensure it remains relevant and appropriate to the certificate holder; and Regularly review the safety performance of the certificate holder's organization and direct actions necessary to address substandard safety performance in accordance with 14 CFR, part 5.75, Continuous improvement? 	
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.25 (b)	
	Kind Of Question: Flag, Supplemental, Domestic	
1.8	<p>Does the certificate holder's safety policy require all members of management to develop, implement and maintain SMS processes within their area of responsibility to include, but not limited to, the following:</p> <ul style="list-style-type: none"> Hazard identification and safety risk assessment; Assuring the effectiveness of safety risk controls; Promoting safety as required in 14 CFR, Part 5, subpart E, Safety Promotion; and Advising the accountable executive on the performance of the SMS and on any need for improvement? <p>Note: This question/process includes owners of operational processes (Managers, Directors, etc.), at the decisional level across the organization.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.23 (a) (2)	
	Kind Of Question: Flag, Supplemental, Domestic	
1.9	<p>Does the certificate holder's safety management documentation identify the levels of management with the authority to make decisions regarding safety risk acceptance for the company?</p> <p>Note: This question/process includes owners of operational processes (Managers, Directors, etc.), at the decisional level across the organization.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.23 (b)	
	Kind Of Question: Flag, Supplemental, Domestic	
1.10	<p>Do the certificate holder's safety management processes require the accountable executive to designate a management representative who, on behalf of the accountable executive, are responsible for:</p> <ul style="list-style-type: none"> Coordinating the implementation, maintenance, and integration of the SMS throughout the certificate holder's organization; Facilitating hazard identification and safety risk analysis; Monitoring effectiveness of safety risk controls; and Ensure safety promotion is communicated throughout certificate holder's organization; Regularly report to the accountable executive on the performance of the SMS and any need for improvement? <p>Note: This question/process includes safety support personnel such as a Safety Officer, Director of Safety, Safety Department, etc., and associated staff.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.25 (c)	

	Kind Of Question: Flag, Supplemental, Domestic	
1.11	<p>Where emergency response procedures are necessary, does the certificate holder develop and does the accountable executive and management representative approve as part of the safety policy an emergency response plan that provides for the safe transition from normal to emergency operations, and that addresses at least the following:</p> <ul style="list-style-type: none"> • Delegation of emergency authority throughout the organization; • Assignment of employee responsibilities during the emergency; and • Coordination of the emergency response plan with other affected organizations (e.g., code share partners, airports, contractors, affiliates, etc.)? 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.21 (a) (6); 5.27 (a-c)	
	Kind Of Question: Flag, Supplemental, Domestic	
1.12	<p>Does the certificate holder have a process to develop and maintain SMS documentation that describes the certificate holder's safety policy, processes and procedures?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.21 (c); 5.95 (a);	
	Kind Of Question: Flag, Supplemental, Domestic	
1.13	<p>Does the certificate holder's safety management system ensure compliance with the relevant regulatory standards in 14 CFR?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.3(c)	
	Kind Of Question: Flag, Supplemental, Domestic	

SAI SECTION 1 - PROCEDURES ATTRIBUTE	
Drop-Down Menu	
1.	No policy, procedures, instructions, or information specified.
2.	Procedures or instructions and information do not identify who, what, when, where, how.
3.	Policy, procedures, or instructions and information do not comply with CFR.
4.	Policy, procedures, or instructions and information do not comply with FAA policy and guidance.
5.	Policy, procedures, or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen Charts, etc.).
6.	Policy, procedures, or instructions and information unclear or incomplete.
7.	Documentation quality (e.g., unreadable or illegible).
8.	Policy, procedures, or instructions and information inconsistent across certificate holder manuals (FOM - Flight Operations Manual to GMM - General Maintenance Manual, etc.).
9.	Policy, procedures, or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).
10.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
11.	Other.

SAI SECTION 2 - CONTROLS ATTRIBUTE

Note: A Safety Management System (SMS) is a fully integrated structure and as such has the six system attributes built in to the design of an SMS. Therefore, specific questions referring to the system attributes are not required for Sections 2 through 5 of this data collection tool.

SAI SECTION 3 - PROCESS MEASUREMENT ATTRIBUTE

Note: A Safety Management System (SMS) is a fully integrated structure and as such has the six system attributes built in to the design of an SMS. Therefore, specific questions referring to the system attributes are not required for Sections 2 through 5 of this data collection tool.

SAI SECTION 4 - INTERFACES ATTRIBUTE

Note: A Safety Management System (SMS) is a fully integrated structure and as such has the six system attributes built in to the design of an SMS. Therefore, specific questions referring to the system attributes are not required for Sections 2 through 5 of this data collection tool.

SAI SECTION 5 - MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTE

Note: A Safety Management System (SMS) is a fully integrated structure and as such has the six system attributes built in to the design of an SMS. Therefore, specific questions referring to the system attributes are not required for Sections 2 through 5 of this data collection tool.

