

## SMS for Part 121 Notice of Proposed Rulemaking (NPRM)

### Safety Attribute Inspection (SAI) Data Collection Tool

#### 8.4.1 Safety Promotion

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

### ELEMENT SUMMARY INFORMATION

#### Scope of Element:

**Purpose** (operator's responsibility): To provide training to each individual to ensure the individuals attain and maintain the competencies necessary to perform their duties relevant to the operation and performance of the SMS and to develop and maintain a means for communicating safety information throughout the organization.

**Objective** (FAA's oversight responsibility): To determine if the operator has:

1. Provided training to each individual identified in § 5.23 to ensure the individuals attain and maintain the competencies necessary to perform their duties relevant to the operation and performance of the SMS.
2. Developed and maintained a means for communicating safety information that, at a minimum:
  - Ensures that employees are aware of the SMS policies, processes, and tools that are relevant to their responsibilities;
  - Conveys hazard information relevant to the employee's responsibilities;
  - Explains why safety actions have been taken; and
  - Explains why safety procedures are introduced or changed.

#### 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, including its inherent ability to identify and control or eliminate hazards, considering size/scope/complexity of the carrier.

### SUPPLEMENTAL INFORMATION

#### Regulatory Requirements\*:

5.3, 5.23, 5.25, 5.91, 5.93, 5.95 and 5.97

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

**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

<b>SAI SECTION 1 - PROCEDURES ATTRIBUTE</b>	
<b>Objective:</b>	
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)	
<b>Tasks</b>	
	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.

<b>Questions</b>		
<b>1.1</b>	Does the certificate holder's safety management system have a safety promotion component that is in accordance with 14 CFR part 5, subpart E Safety Promotion?  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) (4):	
	Kind Of Question: Flag, Supplemental, Domestic	
<b>1.2</b>	Do the certificate holder's safety management processes ensure that the accountable executive designates sufficient management personnel who, on behalf of the accountable executive, are responsible for ensuring safety promotion throughout the certificate holder's organization?  Note: This question/process includes safety support personnel such as a Safety Officer, Director of Safety, Safety Department, etc., and associated staff.	<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) (4)	
	Kind Of Question: Flag, Supplemental, Domestic	
<b>1.3</b>	Does the certificate holder's safety management system define accountability for promoting safety for each operational manager in their areas of responsibility?  Note: This question/process includes owners of operational processes	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable

	(Managers, Directors, etc.), at the decisional level across the organization.	
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.23(a) (2) (iii):	
	Kind Of Question: Flag, Supplemental, Domestic	
1.4	Does the certificate holder's safety management system have a process to ensure that the certificate holder provides training to each individual identified in § 5.23 to ensure the individuals attain and maintain the competencies necessary to perform their duties relevant to the operation and performance of the SMS?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.91;	
	Kind Of Question: Flag, Supplemental, Domestic	
1.5	Has the certificate holder developed and does it maintain a means for communicating safety information that at a minimum: <ul style="list-style-type: none"> <li>• Ensures that all employees are aware of the SMS;</li> <li>• Conveys safety critical information;</li> <li>• Explains why particular safety actions are taken; and</li> <li>• Explains why safety procedures are introduced or changed.</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.93;	
	Kind Of Question: Flag, Supplemental, Domestic	
1.6	Does the certificate holder have a process to develop and maintain SMS documentation that describes the certificate holder's safety promotion processes and procedures?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.3 (b); 5.95 (b):	
	Kind Of Question: Flag, Supplemental, Domestic	
1.7	Does the certificate holder have processes to maintain the records of all SMS training accomplished for each individual for a minimum period of 24 consecutive calendar months after the completion of training?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.3(b) & 5.97(c);	
	Kind Of Question: Flag, Supplemental, Domestic	
1.8	Does the certificate holder retain the records of all SMS safety communications for a minimum of 24 consecutive calendar months?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
	Updated: Rev # X on XX/XX/XXXX	
	SRRs: 5.3(b) & 5.97 (d):	
	Kind Of Question: Flag, Supplemental, Domestic	

<b>SAI SECTION 1 - PROCEDURES ATTRIBUTE</b>	
<b>Drop-Down Menu</b>	
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 the 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 the 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 the 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 the data collection tool.