

IEP CHECKLIST

A SAFETY ASSURANCE COMPONENT OF YOUR SMS

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FEBRUARY 2025

OPERATIONS 2.

Safety Management Performance Checklist (PART 91/135)

Safety Management:

A safety management system (SMS) is established or being implemented. The organization's safety posture is well defined by effective non-punitive policies from company leadership that are acknowledged by all employees. All personnel understand and operate in accordance with these safety policies. Clear, concise, and functional procedures and processes exist to facilitate active involvement by all personnel, and information is accumulated and analyzed for trends and risk management. Available safety data is disseminated properly and promptly. Management is engaged, supportive, and takes timely action to resolve unsafe conditions. An SMS that is constructed according to the ICAO model is active and effective. **Note:** ARGUS Platinum references apply to Part 135 or commercial operators only.



PART 135



PART 91

1. Are company employees familiar with the SMS guidance (manual) contents and understand the details of the company's SMS?

(IS-BAO 3.4; FAA AC 120-92D 2.1.5, 3.3.2.3.3, Appendix A – §5.91; NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.1.1[b], 1.2.1[f], 1.8.1 & 1.8.4[a])

(Organization and Personnel) Employees should have cognizance of the contents of the safety manual, and there is evidence the manual reflects the actual practices of the company, and vice versa. Interview all the employees briefly to determine if they understand the company's policies and procedures related to its SMS.

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2. Is there an appointed safety manager? Are lines of authority and duties and responsibilities clearly defined for the safety manager?

(IS-BAO 3.1.2, 3.1.3.1; FAA AC 120-92D 3.3.3, Appendix A - §5.25; NBAA Management Guide 1.1.4.2 & 1.3.2; ARGUS Platinum 1.3.3 & 1.4)

(Organization and Personnel) The safety manager position's reporting chain should be clearly depicted with specific reporting descriptions. Access to upper management is critical to facilitate awareness. Company personnel must be familiar with the identity of the safety manager. What is the turnover rate associated with this position? If safety managers are consistently short tenured (2 years or less), effective safety management is difficult.

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3. The designated safety manager has the abilities, availability, training, and required resources to exercise the authority, duties and responsibilities defined in company policy.

(IS-BAO 3.1.2.1, 3.1.3.1, 3.4, 7.2; FAA AC 120-92D 3.3.3; 3.6.1; Appendix A - §5.25, §5.91; NBAA Management Guide 1.1.4.2, 1.3.2; ARGUS Platinum 1.1.1[b], 1.2.1[c] & 1.4)

(Organization and Personnel) The safety manager must display the ability to effectively monitor and execute the processes of the SMS with the cooperation of other managers and employees. The organization itself should not be a hindrance; the safety manager must have adequate time and resources to effect required actions. Although the safety manager typically has other duties, their schedule must allow enough work time available to fulfill assigned safety duties and responsibilities. At a minimum the safety manager should receive introductory training on the implementation and execution of an SMS, and emergency response planning. The company should also provide access to professional training and materials such as periodicals and professional websites.

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4. Is there a defined Emergency Response Team identified?

(IS-BAO 4.3; FAA AC 120-92D 3.3.5, Appendix A - §5.27; NBAA Management Guide 1.1.4.2, 1.1.6; ARGUS Platinum 2.2)

(Organization and Personnel) Each person on the response team must be familiar with their assigned duties and responsibilities in the ERP. Team members should also be prepared to assume additional duties in the event a team member is unavailable. There needs to be a designated company official who is responsible for leading the emergency response.

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5. Are there considerations for dealing with the impact and effects of the accident on company operations and affected employees?

(IS-BAO 4.1.4[j], 4.1.4[i]; FAA AC 120-92D 3.3.5, Appendix A - §5.27; NBAA Management Guide 1.1.4.2, 1.1.6)

(Organization and Personnel) Will the company continue flight operations? Who will make the determination? There needs to be an orderly and efficient transition from normal operations to emergency operations and returning back to normal operations. Company personnel may be significantly impacted by the events of an accident. Consider prearranging trauma counseling services and other crises intervention support for persons involved or affected by the event.

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6. Examine the SMS guidance document (manual or SMS components described in a company manual) and verify it is aligned with current safety management directives to include policies and procedures that define the company's safety management system. How thorough and specific is the safety management system defined?

(IS-BAO 3.1; FAA AC 120-92D 1.1, 1.1.1, 1.2, Appendix A – §5.21 & §5.23; NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.1.1, 1.2.1, 1.5.1)

(Programs/Procedures) The policies and procedures should be specific, comprehensive, containing all elements of a safety management system as described in the ICAO 2018 Safety Management Manual (for U.S. operators, AC 120-92B also applies). The SMS must contain documented policies and procedures specifically tailored to the organization, in order to fit its unique operation. A periodic review of these policies and procedures is evident and is conducted to ensure accuracy. For Part 135 operators, referencing the SMS manual within the GOM will allow for changes to be easily made by the safety manager without having to attain FAA approval for GOM changes.

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7. Is there an appropriate SMS training program for employees? Does this training effectively prepare and encourage employees to actively participate in the company's safety processes?

(IS-BAO 3.4.1; FAA AC 120-92D 2.1.5, 3.6, Appendix A - §5.91; NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.8.1 & 1.8.3)

(Programs/Procedures) Educating employees on the purpose and utilization of the SMS is critical to success. Existing training materials and documented training sessions will indicate the soundness of the training program. The training materials should contain specific information describing the company's SMS. If employees are trained adequately, they will be more likely to contribute and be involved. This training would be done initially and as refresher whenever deemed necessary.

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8. Is there a defined safety risk management process employed that analyzes identified hazards, assesses the risk to the organization, and determines controls to reduce unacceptable risk to an acceptable level?

(IS-BAO 3.2; FAA AC 120-92D 3.4, Appendix A - §5.53 & §5.55(a); NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.6)

(Programs/Procedures) Safety risk management in an SMS may interact with change management and is required when any of the following occur: implementation of a new system; revision of existing systems; development of operational procedures; and identification of hazards or ineffective risk controls. Look for evidence of documented hazard analysis that identifies the hazard, determines the root cause, and measures the risk to the operation. Once the risk is measured it must be determined acceptable or not acceptable based on probability and severity criteria. This entire process is defined in the company's SMS guidance manual/chapter. Risk assessments must be kept as part of SMS documentation. NOTE: This is NOT a flight risk analysis tool form (FRAT).

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9. Is there an active internal evaluation program (IEP) that is performing effectively as an SMS safety assurance component? Are internal audits/evaluations performed with regularity? Are the company policies and procedures being complied with? Is there oversight on satellite bases?

(IS-BAO 2.7.7, 3.3.1.1, 3.5.3; FAA AC 120-92D 2.1.4, 3.5, Appendix A - §5.71; NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.7.3-1.7.10)

(Programs/Procedures) An internal evaluation program is a vital safety assurance component of an SMS. FAA AC 120-59 series provides excellent guidance on IEP development and execution. An ongoing evaluation program facilitates evaluation of the current level of performance for organizational focus areas and ensures company policies and procedures are being complied with. The IEP should include departmental checklists and a process to ensure oversight of each satellite base. Individuals conducting audits and evaluations should have some type of training. There is a Safety Training Element for this purpose posted on the PRISM website. Formal training may also be appropriate, depending on the complexity of the organization involved. The IEP should be an independent function that reports directly to senior management and/or the safety department.

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10. Is a root cause analysis process used to accurately determine the cause of each discrepancy found during the internal audit/evaluation? Is there a tracking and corrective action process for findings (deficiencies)? A tracking method and corrective action plan is employed to help prevent repeat discrepancies.

(IS-BAO 2.3, 2.7.7, 3.3.1.1; FAA AC 120-92D 2.1.4, 3.5, Appendix A - §5.71; NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.7.6)

(Programs/Procedures) A root cause analysis should be performed on all findings/discrepancies identified through the IEP. Once each discrepancy has been analyzed and the root cause is determined a corrective action should be implemented to correct the targeted deficiency. The corrective action process includes follow-up on each corrective action to verify its effectiveness. Root cause trends based on historical data must be analyzed as part of the corrective action process.

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11. Is there an active and effective safety hazard identification and reporting process? Is an investigation conducted on all incident and accident reports? Does the hazard identification process include a review of hazards from appropriate external sources?

(IS-BAO 3.2, 3.3.1.1; FAA AC 120-92D 3.4, Appendix A - §5.53 & §5.71(a)(7); NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.6.2-1.6.8)

(Programs/Procedures) A score of '5' would indicate sustained consistent active employee participation in the reporting program and commensurate root cause and trend analysis activity. An appropriate non-punitive philosophy, in writing, should support the reporting process. A score of '3' would indicate a program is in place; however, participation is minimal. A score of '1' would indicate nothing is in place. The hazard identification and reporting process should include reactive and proactive methods to collect safety data. An analysis of each reported event should follow the risk management process which includes a root cause analysis, risk assessment, corrective action, and a follow-up to verify the effectiveness of the mitigation. An effective process demands resolution, through tracking, trending and feedback to the organization. Subject matter experts should be involved in the resolution when required.

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12. Is there a change management process that identifies responses to significant changes within the organization or to its operating environment?

(IS-BAO 3.3.2; FAA AC 120-92D 3.4.1.3, Appendix A - §5.73(b) and (a)(2)-(5); NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.7.2)

(Programs/Procedures) Change management in an SMS interacts with risk management when any of the following occur: implementation of a new system; revision of existing systems; development of operational procedures; and identification of hazards or ineffective risk controls. Any type of change may be accompanied by an increase in risk. Proactively, any change driven by the organization that effects system design (expansion of maintenance actions or a new aircraft, for example), new operational procedures (going to a completely new international operating area like Africa), or major modifications to operations/procedures, requires a formal documented risk assessment to ensure the associated change has not created excessive risk.

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13. Are safety objectives defined? Are the safety objectives and goals measurable?

(IS-BAO 3.1.1.2; FAA AC 120-92D 2.1.2, 2.1.4, 3.3, 3.5.10; ARGUS Platinum 1.2.2, 1.7.1)

(Programs/Procedures) Safety objectives form the basis for performance monitoring and measurement therefore should be well defined, updated, and communicated throughout the organization. Safety objectives reflect the organization's commitment to maintain and continuously improve the overall effectiveness of the SMS. Safety objectives should be reviewed at least annually and revised to ensure they remain relevant and appropriate.

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14. Are there established procedures and methods to communicate safety information from management to all employees, and vice versa?

(IS-BAO 3.4.2.1; FAA AC 120-92D 3.5.7, 3.6.2, Appendix A - §5.93; NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.8.4)

(Programs/Procedures) Use of bulletins, read files, regular meetings, email, publications, hotline phone, irregularity reports, and hazard report feedback are all examples of proven means of communication. Examine communication between satellite organizations also, if applicable; this is especially important due to distance challenges that exist.

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15. Assess the current state of the safety culture throughout the entire organization.

(AC 120-92D 2.5)

(Programs/Procedures) Interact with as many employees as possible to evaluate the culture. The use of a Safety Survey should be considered if not previously performed. PRISM can conduct a safety survey for your operation if desired. If a safety survey of the operation was conducted examine the results and determine if constructive changes were made based on the survey results.

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16. Do newly hired employees receive SMS training/orientation training within 90 days of hire? Examine the documentation to verify.

(IS-BAO 3.4; FAA AC 120-92D 3.6.1, Appendix A - §5.91; NBAA Management Guide 1.1.4.2, 2.1.4; ARGUS Platinum 1.8)

(Programs/Procedures) The 90-day requirement for SMS training is a PRISM recommendation to ensure it is accomplished as a component of some type of indoctrination training. Training can also be recurrent, and reinforce the benefits of an SMS, and the value of employee participation. The SMS cannot be effective without employee understanding, involvement and contribution.

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17. If a safety committee or action group is formed, does it meet on a regular basis? Is the committee engaged in pertinent issues, and display appropriate action to positively affect the organization?

(FAA AC 120-92D 3.4.2 & 3.4.3, 3.6.2, Appendix A - §5.23 & §5.53; NBAA Management Guide 1.1.4.1; ARGUS Platinum 1.3.4, 1.8.4[c])

(Programs/Procedures) The safety committee should be comprised of a representative from each functional area of the organization. Meetings should be held at least quarterly and be chaired by a member of management. Safety committee minutes should be comprehensive and detailed to clearly outline risks identified and actions taken. The assignments, actions and decisions of the committee are monitored and tracked by its members.

- a. If the organization does not have a safety committee because of small size, it is expected that formal meetings among employees occur to discuss safety information to include identified hazards, risk assessments, and corrective actions/controls with employees. These meetings must be documented by a minutes summary and action items.

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18. Is data documentation from SMS processes collected, analyzed, and stored effectively? Is this documented data used in various ways to improve the risk exposure and efficiency of the operation?

(IS-BAO 3.2, 3.3; FAA AC 120-92D 3.5, Appendix A - §5.55(a) & §5.71; NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.6)

(Programs/Procedures) The information gathered from hazard reporting, risk assessment, internal evaluations, third party audits, and external sources must be proactively utilized for trending, predictive modeling, and risk management. Information input will benefit the operation when used to define or modify organizational behavior. The documentation/information must be stored in a manner that allows tracking and trending.

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19. Is a Company/Operator Safety Risk Profile (SRP) completed and maintained?

(IS-BAO 3.2.1.1; FAA AC 120-92D 3.5, Appendix A - §5.55(a) & §5.71; NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.6.1, 1.6.3, 1.6.4, 1.6.9)

(Programs/Procedures) A Safety Risk Profile, or similar tool, should be developed to document the hazards and associated risks identified in operations as well as the mitigations developed to treat the risk. At a minimum the SRP should assess the company's/operator's risk in the following categories: flight operations, maintenance/ground operations, company-wide human factors, and facilities. The SRP should be reviewed and updated at least every 24 months or when a significant change in the organization occurs. It should also be used to develop a Flight Risk Analysis Tool (FRAT) to assess operational risk factors for each flight. The SRP needs to include the following items for each category:

- A list of significant/prominent loss exposures;
- The associated risks (both pre-mitigation and post-mitigation);
- A pre-mitigation evaluation of likelihood and severity for each risk;
- A description of the mitigation used; and
- A post-mitigation evaluation of likelihood and severity for each risk.

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20. Are safety performance indicators (SPIs) established and utilized effectively? Are there associated targets and thresholds corresponding to each SPI?

(IS-BAO 3.3.1.2; ARGUS Platinum 1.7.1)

(Programs/Procedures) The design of SPIs should reflect measurements of indicators considered key aspects of the operation. Indicators should contain a mixture of lagging (negative events that already occurred, divided into high level and low-level system failures. Examples are runway excursions/1000 landings and un-stabilized approaches/1000 landings) and leading (things that could cause a negative outcome or positive contribution in the future) indicators. Leading indicators are used to influence priorities and determine actions; an example is the number of SOP changes generated from hazard identification and risk management. These SPIs should be formally documented and actively tracked for measurement.

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21. Are periodic formal assessments performed to ensure operational compliance with applicable regulations, standards, and approvals and exemptions?

(IS-BAO 3.5.1; FAA AC 120-92D 4.2.2; ARGUS Platinum 1.9.1)

(Programs/Procedures) There should be a documented process to periodically identify and assess applicable regulations, standards, approvals and exemptions to ensure company procedures remain in compliance. Any new regulations, standards, and/or exemptions that are identified need to be incorporated into the organization's procedures. Records of these assessment should be kept. The internal audit/evaluation program should include verification of company processes established to ensure compliance with applicable regulations, standards, and exemptions during daily operations.

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22. Is there an established flight data analysis (FDA) program?

(IS-BAO 3.6.1; FAA AC 120-82; ARGUS Platinum 1.10.1)

(Programs/Procedures) The Flight Data Analysis program provides collection and analysis of digital flight data generated during aircraft operations. An FDA program can provide objective safety information that is otherwise unattainable and is an integral part of the SMS. The value of an FDA program is the early identification of adverse safety trends that, if uncorrected, could lead to accidents. A key element in an FDA program is the application of corrective action and follow-up to assure that unsafe conditions are effectively remediated; however, the cornerstone of the program is the understanding and assurance that the data collected is confidential and provides anonymity.

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23. Is there a comprehensive Emergency Response Program (ERP) manual that includes policies and a response plan for an accident or emergency? The manual is a controlled document, with revisions entered and tracked.

(IS-BAO 3.1.4; FAA AC 120-92D 3.3.5, Appendix A - §5.27; NBAA Management Guide 1.1.4.2, 1.1.6; ARGUS Platinum 2.1)

(Programs/Procedures) The manual must be tailored to the organization to reflect specific details. Items like current phone numbers are crucial to an effective response. It should also contain user-friendly first-action checklists for key responders to use when reacting to an emergency. Specific notification procedures are in place, for both internal and external requirements. A periodic review must be conducted to ensure accuracy, especially regarding any contact information.

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24. Is there documented training specifically regarding the functioning of the ERP? Have ERP drills been conducted?

(IS-BAO 4.3; FAA AC 120-92D 3.3.5, Appendix A - §5.27; NBAA Management Guide 1.1.4.2, 1.1.6; ARGUS Platinum 2.3, 2.4)

(Programs/Procedures) All personnel involved in flight operations and maintenance need to have a working knowledge of the ERP. All employees should receive periodic training on the ERP at least every twenty-four months after initial training. ERP drills must be run annually at a minimum for proficiency and to identify deficiencies in the response procedures. Each drill must be documented, with notes to facilitate the quality improvement of the ERP. ERP Drills should include participation from internal and external functions necessary to ensure the ERP is effective.

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25. Are support options in place to handle next-of-kin notification, grief counseling, and family assistance in the event of an accident?

(IS-BAO 4.1.4[d], 4.1.4[g], 4.1.4[j], 4.1.4[k]; FAA AC 120-92D 3.3.5, Appendix A - §5.27; NBAA Management Guide 1.1.4.2, 1.1.6; ARGUS Platinum 2.1.3[d], 2.1.3[e])

(Programs/Procedures) Flight operators may need outside assistance through third party professionals in dealing with these matters. Verify the intended process, ensure it is adequately documented with instructions, and thorough arrangements have been made in the event of an accident. Parent corporation resources should be utilized if available.

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26. How are appropriate authorities properly notified? Are on-site accident response members identified, appropriately trained, and prepared to participate in an NTSB accident investigation?

(IS-BAO 4.1.4[a], 4.1.4[i], 4.3; FAA AC 120-92D 3.3.5, Appendix A - §5.27; NBAA Management Guide 1.1.4.2, 1.1.6, 2.1.11; ARGUS Platinum 2.1.3, 2.2, 2.4)

(Programs/Procedures) There should be procedures to ensure the necessary authorities are properly notified in the event of an emergency and that all company personnel cooperated during the investigation. If a Go-Team is sent to the site, these personnel should receive training in the NTSB accident party process, blood borne pathogens, and personal protection equipment. They should also receive and provide documentation for a Hepatitis B inoculation or show documentation of refusal to take the inoculation. At a minimum, at least one company representative is prepared to be dispatched to an accident site.

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27. Does the ERP have defined procedures regarding media interaction in the event of an accident?

(IS-BAO 4.1.4[h]; FAA AC 120-92D 3.3.5, Appendix A - §5.27; NBAA Management Guide 1.1.4.2, 1.1.6)

(Programs/Procedures) Procedures defining who from the company is allowed to release information to the media are a critical part of minimizing misinformation. The ERP should contain a prepared media statement that can be rapidly edited for use. The individual selected to be the "face" of the company should have some training or experience regarding media presentation.

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28. Are there procedures in place to protect and preserve the Cockpit Voice Recorder (CVR) and Flight Data Recorder (FDR) data?

(IS-BAO 4.1.4[f]; AC 120-92D Appendix A - §5.27; ARGUS Platinum 2.1.3[h]; ICAO Annex 13; NTSB 830.10; NBAA Management Guide 1.1.6)

(Programs/Procedures) In the event of an accident, the flight crew or the operator should follow procedures to retain and preserve all related flight recorder records in accordance with ICAO Annex 13 until the NTSB or investigating agency takes custody of the recorders or a release is granted.

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29. Does the ERP include procedures that also apply to other emergency events other than aircraft accidents?

(IS-BAO 4, 4.1.2; AC 120-92D 3.3.5, Appendix A - §5.27; NBAA Management Guide 1.1.4.2, ARGUS Platinum 2.1.2)

(Programs/Procedures) The ERP should include procedures for response to emergency events such as natural disasters, fire or explosions, violence in the workplace, bomb threats, acts of terrorism, missing aircraft, substantial damage, facility accident/incident, and health-related events. Many, if not all, of the procedures designed for aircraft accidents may apply. Trigger circumstances should be defined and referred to during ERP training.

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30. Are there on-site procedures for the flight crew to take in the event of an aircraft accident? Is there a process to ensure that a list of emergency and survival equipment onboard each aircraft is provided to rescue coordination centers?

(IS-BAO 4.1.4[e], 4.2.1; FAA AC 120-92D 3.3.5, Appendix A - §5.27; NBAA Management Guide 1.1.6, 2.1.4, 2.1.11, 2.2.13; ARGUS Platinum 5.3.3[b])

(Programs/Procedures) Crew members should be properly trained in emergency procedures and understand their roles and responsibilities. Crew member responsibilities include: assisting passengers, preserving the integrity of the accident site, make notifications, and preparing visual distress signals if the accident occurred in a remote area. There needs to be a list of all available emergency and survival equipment onboard each aircraft. This list needs to be kept updated and readily available to provide search and rescue authorities. The list should include the following items:

- The number, color, and type of life rafts and pyrotechnics;
- Details of emergency medical supplies and water supplies; and
- The type and frequencies of the emergency portable radio equipment.

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31. Are there procedures to establish an Emergency Response Center (if necessary)?

(IS-BAO 4.1.4[b]; FAA AC 120-92D 3.3.5, Appendix A - §5.27; NBAA Management Guide 1.1.4.2, 1.1.6)

(Programs/Procedures) Depending on the emergency, an emergency response center may need to be established to properly handle the emergency response. The emergency response center needs to include all necessary supplies such as: forms/checklists, paper, computers, telephones, and contact details, as well as snacks and water.

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32. Are employees provided the necessary feedback on safety hazard report submissions?

(IS-BAO 3.4.2.1; FAA AC 120-92D 3.6.2, Appendix A - §5.71(a)(7) & §5.93; NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.6.6, 1.8.4)

(Communication) For an SMS to function correctly employees must be aware of submitted reports and corrective actions taken if their area of responsibility is affected. Initial feedback to the submitter may be appropriate, followed by documented communication to make all stakeholders aware.

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33. Is senior management kept informed of significant safety-related issues and are they involved in the evaluation and risk resolution of these issues on a consistent basis? How is this accomplished?

(IS-BAO 3.1.2.1, 3.4.2.1; FAA AC 120-92D 3.3.3, 3.5.10, Appendix A - §5.75 & §5.93; NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.3, 1.7.10)

(Communication) Company leadership should be verifiably involved in significant SMS based risk decision making via establish process interaction. Risk assessment, internal evaluation discoveries, hazard reporting, Safety Committee actions, etc. must be accessible for review by senior managers. The tone and vibrancy of an SMS is directly correlated to leadership participation and advocacy.

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34. A published safety policy statement is signed by the accountable executive. The policy clearly defines management's commitment to safety and contains a non-punitive posture for safety reporting and error management. The statement is adequately distributed and available to all employees and is kept up to date.

(IS-BAO 3.1.1.1; FAA AC 120-92D 2.1.4., 3.3, Appendix A - §5.21; NBAA Management Guide 1.1.4.2; ARGUS Platinum 1.2)

(Policy) This statement is a concise message (typically one page) to company employees that provides validity to the SMS, as well as confidence in the goals it sets. When the commitment comes from the top, employees are more likely to embrace and participate in the SMS. Determine if there have been any instances of inconsistency between actions and policy. This policy should be reviewed and updated at least every two years or upon a change of the accountable executive.

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