

IEP CHECKLIST

A SAFETY ASSURANCE COMPONENT OF YOUR SMS

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AUGUST 2026

OPERATIONS 11.

Security & Dangerous Goods (PART 135)

Security & Dangerous Goods: Flight operations should have a defined and documented security program in place that is proportional to potential threats and ensures personnel, facilities, and equipment are adequately protected. Protocols that describe security requirements for the operational environment at the home location and destinations are instituted. Threat assessments are conducted. Procedures for reacting to security related emergencies are in place and effective. Crews are prepared for security contingencies as part of trip planning. A hazmat program is in place for Will-Carry or Will-Not-Carry and company specific hazmat procedures and training are documented.



PART 135

1. Is there a designated security manager (title) who is assigned responsibility for overseeing and monitoring the security of the operation?

(NBAA Management Guide 3.3)

(Supervisory) Although the scope of responsibility for security differs for each operation, a designated person responsible for oversight will help ensure the company facilities, equipment, and personnel are as secure as possible. In most Business Aviation operation circumstances this duty can effectively be assigned as a secondary responsibility.

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2. Interview employees to determine their perspective on security threats and the operation's security posture

(IS-BAO 5.1.2; NBAA Management Guide 1.5 & 4.2.4)

(Policy) Company employees should understand what security requirements exist and know when they are required. Their perception of threats and the company's ability to prevent or address them is important.

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3. Is there a documented security program based on current company activities that clearly defines the policies, requirements, procedures, and training necessary to maintain an effective security posture?

(49 CFR 1544.101; IS-BAO 5.1; ARGUS Platinum 5.5.1 & 7.11.1; NBAA Management Guide 1.5 & 4.2.4)

(Program /Procedures) The security requirements should be defined and documented to prevent on-the-fly interpretations of what is acceptable. A concise and defined security program will anticipate most circumstances and standardize planning/reactions. Consider combining a security response with the ERP in some type of fast reaction checklist that accomplishes the minimum steps until responders are engaged. The scope of the program shall be proportional to the threat against the operation.

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4. Is there a job description for the PIC that includes the assignment of Ground Security Coordinator (GSC)/In-Flight Security Coordinator (ISC)?

(49 CFR 1544.215, FAR 135.331[B][3][v]; ARGUS Platinum 5.5.1.a; NBAA Management Guide 4.1.4)

(Program /Procedures) The designated GSC/ISC must have a working knowledge of TSA requirements and company security procedures. The GSC/ISC should be trained on their duties to include monitoring ground handling operations, passenger manifest validation and firearms security. This training is current for 12 months.

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5. Does the company require a security assessment prior to operating at a destination location?

(IS-BAO 5.1.2; NBAA Management Guide 1.5 & 4.2.4; ARGUS Platinum 7.11.1)

(Program /Procedures) Although a security assessment is not always appropriate for every location, the possibility of an aircraft destination turning into an unplanned overnight always exists. Crews should be prepared with standard contingency plans for those locations that require security measures based on an advanced evaluation of the site. In the event of an urgent situation or emergency, reliable and appropriate contact numbers must be available. International sites may demand specific security assessments due to diverse circumstances at worldwide locations. If changed occur after arrival, are crews prepared to deal with them, and are they backed up by company procedures?

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6. Are formal security assessments conducted to evaluate the potential security dangers the operation is exposed to?

(IS-BAO 5.1.2; NBAA Management Guide 1.5)

(Program /Procedures) Assessments for bomb threats, hangar/facility, and ramp incursions, should be conducted and periodically reviewed to ensure currency. As facility and ramp conditions change, assessments need to be updated. Assessments of security exposures at frequent long-term sites should also be conducted.

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7. Is appropriate security information provided to passengers when the situation dictates?

(NBAA Management Guide 1.5)

(Program /Procedures) Passengers should be made aware of any security concerns associated with the aircraft and the destination airport. They should be made aware of any actions that might illicit an unexpected response when in and around the aircraft. Some of these things are site specific and should be included in the passenger safety briefing specific to the destination.

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8. Verify when boarding the aircraft passengers are screened for proper photo ID, manifested, and all baggage is positively controlled and matched.

(49 CFR 1544.201-1544.207; NBAA Management Guide 1.5 & 4.2.4)

(Program /Procedures) Frequent passengers will not require this level of scrutiny in terms of ID, but all baggage should still be verified. Consider control tags to ID bags for clearance aboard company aircraft. Last minute manifest changes can present difficult and confusing circumstances, but the security requirements must not be overlooked. Crew members should also display ID badges at all times.

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9. Evaluate the procedures and equipment used to ensure security during aircraft servicing and while the aircraft is left unattended by a company flight crew.

(49 CFR 1544.225; IS-BAO 5.1; NBAA Management Guide 1.5; ARGUS Platinum 7.10.10)

(Program /Procedures) A company employee should be always monitoring the activity around an aircraft when preparing for departure. Catering and other services should not have free access to the aircraft while unattended. When the aircraft is left unattended, at a destination overnight for example, are there sufficient tamper deterrents? Well fitted aircraft covers, plugs, and caps can show if tampering occurred if they are not properly re-placed in position. Aircraft window shades can be used to deter "peekers." Tamper-evident tape or electronic devices will show evidence of aircraft entry point tampering. Engaged control locks can also prevent damage.

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10. Evaluate compliance with the Transportation Safety Administration (TSA) Twelve-Five Standard Security Program.

(TSA 12-5 Standard Security Program TFSSP)

(Program /Procedures) As of March 2004, the TSA issued directives that require commercial carriers to electronically provide a Master Crew List (MCL) and crew manifest data to the TSA. Updates to the MCL must be used to maintain accuracy. The Advance Passenger Information System (APIS) is used to submit manifests via a web-based interface.

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11. Are there procedures in place that require the aircraft cabin to be checked for unauthorized items prior to each flight? If yes, are these procedures being followed?

(49 CFR 1544.225[c]; NBAA Management Guide 1.5)

(Program /Procedures) The aircraft must be inspected for suspicious or unauthorized items that may have been inadvertently, or intentionally, left on the aircraft. Inspection of typical hazmat locations onboard each aircraft should be accomplished pre and post flight. Do crews perform this check after deplaning passengers on a turn-around flight? Proper security demands that the aircraft is screened after de-planing passengers.

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12. Is there an available method for employees to report security concerns/incidents? When security concerns or incidents are reported, are they resolved in a timely and effective manner?

(IS-BAO 3.1.1.S1[d], 3.2.1, 3.2.2; ARGUS Platinum 1.2.1, 1.6.6; NBAA Management Guide 1.5)

(Program /Procedures) Security concerns should be formally reported, and employees should be aware of the method and procedures used to do so. These reports can be part of an existing safety hazard and incident reporting. Consider keeping a log to show status and relevance of the reported security threats.

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13. Are the company specific procedures for hazmat adequate?

(FAR 135 Subpart K, 121 appendix O; IS-BAO 11; NBAA Management Guide 1.4)

(Program /Procedures) These procedures must reflect local and company specific requirements and describe how a company will comply with Will-Carry or Will-Not-Carry requirements as defined in the reference. Specifically local procedures must define how an operator will screen and identify materials and allow/prevent carriage of onboard aircraft. It is imperative that only trained employees be allowed to screen, approve, verify, and handle hazmat.

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14. Are methods in place to inform/advise passengers what constitutes hazmat/dangerous goods and whether they can be carried on aircraft?

(IS-BAO 11.1.2; 49 CFR 175.25)

(Program /Procedures) Communicating requirements to passengers in advance can help prevent problems when loading the aircraft. Standard flyers/briefing cards can be used to convey this information if used properly. This information should be available to passengers prior to boarding the aircraft.

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15. Are procedures in place to ensure an accurate list/inventory of cargo items is given to the PIC and maintained as part of the aircraft flight record at home location?

(49 CFR 175.33; FAR 135.63(d); IS-BAO 11.2.3 & 11.2.4; NBAA Management Guide 1.4)

(Program /Procedures) In the event of an aircraft emergency, it is essential that the PIC knows what is carried on the aircraft. If the aircraft is involved in an accident, home based ground personnel involved in the emergency response must have access to the list of items to inform the accident responders. Firearms and other sensitive items should be identified on the aircraft manifest/inventory.

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16. Is security training and are drills conducted to evaluate the operation's exposure and response?

(49 CFR 1544.235; IS-BAO 5.1.2; NBAA Management Guide 1.5 & 4.1.4; ARGUS Platinum 5.5.1)

(Training) Drills can go a long way in verifying the effectiveness of a program. Consider coupling a security feature into your annual ERP drill if it makes sense to do so. Whoever has responsibility for security should be conducting a drill of some limited scope, at a minimum. These drills must be documented appropriately and determine the efficiency of preventative and response measures.

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- 1 – Unsatisfactory
- 2 – Poor
- 3 – Meets Minimum Standards
- 4 – Excellent
- 5 – Best Practice

If your answer is not a 3 or better, you must record a finding that requires corrective action.

17. Is there an effective and compliant training program for hazmat?

(FAR 135 Subpart K; IS-BAO 9.1.1[e]; ARGUS Platinum 4.5.4.d, 5.2.2.c, 8.10.7; NBAA Management Guide 1.1.5 & 4.1.4)

(Training) This training must be accomplished on an initial and annual recurrent frequency. Any individual performing or directly supervising the acceptance, rejection, handling, storage incidental to transport, packaging, or loading of any item onboard an aircraft requires initial and recurrent training. See the referenced FARs for specific details. Crews can use the DOT training materials combined with training on specific company procedures and requirements to satisfy the training requirements for carry or will not carry hazmat. The training program must be approved by the FAA prior to implementation. Even if the operation is will not carry hazmat, identification procedures training and local procedures training is required.

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