

Part 5 SMS Compliance Checklist for Part 135 Operators

Use this checklist to see where your SMS stands before you file your declaration of compliance. Each item is written in plain English and shows its source in 14 CFR Part 5. If you can't check a box, that's a gap to close before May 28, 2027.

Company: _____ Completed by: _____ Date: _____ Items checked: ____ / 38

1. Safety Policy

- ☐ We have a written safety policy signed by our accountable executive.
- ☐ The policy states our safety objectives and our commitment to meet them.
- ☐ The policy commits to providing the resources needed to run the SMS.
- ☐ The policy includes a safety reporting policy that protects employees who report.
- ☐ The policy defines unacceptable behavior and when discipline may apply.
- ☐ We have a written code of ethics stating that safety is the company's top priority.
- ☐ The policy has been shared with every employee.
- ☐ Our accountable executive reviews the policy on a regular schedule.

Source: 14 CFR §5.21

2. Accountability and Key People

- ☐ We have named an accountable executive in writing.
- ☐ We have written safety duties for the accountable executive, managers and employees.
- ☐ We have defined which management levels may accept which levels of risk.
- ☐ We have enough management personnel assigned to run and maintain the SMS.

Source: 14 CFR §5.23, §5.25

3. Emergency Response **CONDITIONAL**

- ☐ We have an emergency response plan, coordinated with the organizations we work with, covering the move from normal to emergency operations and back.

Source: 14 CFR §5.27 — conditional: some operators will need this item, some won't.

4. Safety Risk Management

- ☐ We run SRM when we add a new system (aircraft, base, route), change an existing one, or create a new procedure.
- ☐ We run SRM when Safety Assurance finds a new hazard or an ineffective control.
- ☐ We describe the system before analyzing it, so hazards are identified in context.
- ☐ We identify and document hazards.
- ☐ We assess risk using a defined method (likelihood × severity matrix).
- ☐ We put controls in place and record the residual risk after controls.
- ☐ Risk is accepted only by the management level authorized to accept it.

Source: 14 CFR §5.51, §5.53, §5.55

5. Safety Assurance

- ☐ We monitor our operations and collect safety data.
- ☐ We conduct internal audits of our operational processes.
- ☐ We evaluate the SMS itself.
- ☐ We investigate incidents, accidents and reports of possible noncompliance.
- ☐ We operate a confidential employee reporting system.
- ☐ We assess safety performance against our safety objectives, including review by the accountable executive.
- ☐ When a control isn't working, we take corrective action and track it to closure (owner, due date, status).

Source: 14 CFR §5.71, §5.73, §5.75

6. Safety Promotion

- ☐ Every employee has completed SMS training suited to their job.
- ☐ We share SMS outputs and safety lessons with employees.
- ☐ We explain why safety actions were taken and why procedures changed.
- ☐ We follow up with employees on hazards they reported.

Source: 14 CFR §5.91, §5.93

7. Documentation and Records

- ☐ Our safety policy and SMS processes and procedures are documented (SMS manual).
- ☐ We keep SRM records for as long as the control remains relevant.
- ☐ We keep Safety Assurance records for at least 5 years.
- ☐ We keep SMS training records for as long as the person is employed.
- ☐ We keep safety communications for at least 24 months.

Source: 14 CFR §5.95, §5.97

8. Declaration of Compliance

- ☐ Every item above is in place and working, not just written.
- ☐ We have filed our declaration of compliance with our Flight Standards office by May 28, 2027.

Source: 14 CFR §5.9

Found some gaps? Most operators do. eSMS runs a working Part 5 SMS for you, and our partner Air Carrier Compliance Group can write or update your SMS manual.
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