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From Clarity to Execution

# Audit-Ready SMS

## A Field Guide for Part 135 Operators

Safety Management Systems under 14 CFR Part 5

What the FAA requires, what a working program looks like, and how to get there before the deadline.

*The date: May 28, 2027*

Part 135 operators and Part 91.147 air tour operators must have a working Safety Management System in place and submit a declaration of compliance to the FAA. The rule was published April 26, 2024. The clock has been running since it took effect on May 28, 2024.

**By Captain Bob Wilson**

September 2026

*Written for Part 135 on-demand and commuter operators and Part 91.147 air tour operators. Includes a plain-spoken section for Part 141 flight schools.*

# The short version

If you hold a Part 135 certificate, or fly air tours under a Part 91.147 letter, the FAA has already decided this one for you. The open question isn't whether you need a Safety Management System. It's whether yours will be running on May 28, 2027, or just written down.

This guide is the plain-English version. It covers who the rule applies to, what an inspector expects to see, where operators get caught, and how to work backward from the deadline. No hype and no software pitch.

- **The rule.** 14 CFR Part 5, the FAA's SMS regulation, extended to Part 135 and Part 91.147 operators by a final rule published April 26, 2024 and effective May 28, 2024.
- **The deadline.** May 28, 2027, thirty-six months after the effective date. By then you must have developed and implemented an SMS that meets Part 5 and submitted a declaration of compliance to the FAA. Existing operators were also required to submit an implementation plan for FAA review by November 28, 2024.
- **The declaration is the finish line, not the starting line.** It states that your SMS is already built and running. A program that exists only on paper can't honestly support that statement.
- **Size doesn't get you out of it.** One narrow exception exists. A single-pilot operator who is the only person responsible for the safe operation of the aircraft may apply the excepted sections in 14 CFR 5.9(e). A single-pilot operator with employees must meet all applicable requirements.
- **Part 141 flight schools are a different story.** Part 5 does not, by itself, require an SMS for Part 141 training. See "A word to Part 141 flight schools."

## What to do this week

1. **Call or email your FAA principal inspector.** Confirm your status. Was your implementation plan filed and accepted? Do you hold an SMSVP letter (the FAA's Safety Management System Voluntary Program)?
2. **Name your accountable executive and your SMS lead,** in writing.
3. **Start a hazard list from what you already have:** maintenance write-ups, crew debriefs, near-misses.
4. **Put the dates from "Your runway" on the calendar.** Work backward from May 28, not forward from today.

## Does this apply to you?

Find your row. If you don't see yourself, ask your FAA inspector before you assume either way.

| If you are...                                                                    | Is SMS required?                     | What it means                                                                                                                                                                                                           |
|----------------------------------------------------------------------------------|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Existing Part 135 on-demand or commuter certificate holder                       | <b>Yes</b>                           | Implement an SMS that meets Part 5 and submit your declaration of compliance by <b>May 28, 2027</b> . Your implementation plan was due to the FAA by November 28, 2024. Confirm it was filed and accepted.              |
| Part 135 holder with an accepted SMSVP letter                                    | <b>Yes</b>                           | Your letter remains valid, but you still have until <b>May 28, 2027</b> to meet the updated Part 5 requirements. The letter doesn't exempt you.                                                                         |
| Air tour operator with a Part 91.147 letter of authorization                     | <b>Yes</b>                           | Same rule, same date: <b>May 28, 2027</b> .                                                                                                                                                                             |
| Applying for a new Part 135 certificate or 91.147 letter                         | <b>Yes, as part of certification</b> | New applicants must show an SMS in the certification process. Operators still in certification when the rule took effect have until <b>May 28, 2027</b> .                                                               |
| Single-pilot Part 135 operator                                                   | <b>Yes, with exceptions</b>          | If the single pilot is the only person responsible for the safe operation of the aircraft, the excepted sections in 14 CFR 5.9(e) apply. If you have other employees, you must meet all applicable Part 5 requirements. |
| Part 141 pilot school with no Part 135 or 91.147 operation                       | <b>Not under Part 5</b>              | Voluntary. No May 2027 deadline. See "A word to Part 141 flight schools."                                                                                                                                               |
| School or other business that also holds a Part 135 certificate or 91.147 letter | <b>Yes, for that operation</b>       | Ask your FAA inspector how the SMS must reach into the training side. Running one system across both is often simpler than running two.                                                                                 |
| Part 145 repair station, FBO, or other operator not listed above                 | <b>Not under the 2024 rule</b>       | Voluntary. The FAA has previously asked for public input on a possible future rule for repair stations, so keep an eye on this one.                                                                                     |

When the FAA adopted the rule, it estimated roughly 1,850 Part 135 operators would be covered, so you have plenty of company. The rule also reaches certain Part 21 design and production certificate holders, which this guide doesn't address. Part 121 airlines have operated under Part 5 since 2018.

## What Part 5 asks for

Part 5 rests on four components. All four have to be working. Here they are in plain terms, with what an inspector will want to see.

| Component                        | What it means in your operation                                                                                                                                                                                  | What an inspector will want to see                                                                                                                                           |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Safety Policy</b>          | Leadership owns safety, in writing and in practice. A written policy and objectives, a named accountable executive, a named SMS lead, clear lines of authority, and emergency response that fits your operation. | A signed policy. People who can explain their own roles. Dated records of leadership reviewing safety data and acting on it.                                                 |
| <b>2. Safety Risk Management</b> | Find hazards, rate the risk, decide what to do about it. That includes when you change something: a new aircraft, base, route, or key person.                                                                    | A hazard list built from your real operation. One consistent way of rating risk. Controls tied to each significant risk. Proof you looked at hazards before making a change. |
| <b>3. Safety Assurance</b>       | Check that your controls work, watch the trends, investigate events, and fix what you find.                                                                                                                      | Internal audit results. Trend data. Investigation write-ups. Corrective actions with an owner, a due date, and proof they closed.                                            |
| <b>4. Safety Promotion</b>       | Train people, keep safety in the conversation, and make it safe to report.                                                                                                                                       | Training records by role. A way for employees to report hazards without fear of reprisal, and evidence the reports get answered. Regular safety communication.               |

A five-aircraft charter shop and a fifty-aircraft fleet won't build the same SMS. Both need all four components working. A polished safety policy with no hazard reports behind it won't hold up.

## What “audit-ready” really means

“Audit-ready” is our shorthand, not an FAA term. It means that when someone asks how your SMS works, your people can explain it, your records back them up, and both tell the same story.

Paper doesn't get you there. Practice does. Try this before anyone from the FAA does.

### The four-question test

1. Ask your newest hire what the safety policy says and how they would report a hazard.
2. Pull your last three hazard reports. What happened to each one?
3. Find your last corrective action. Where is the proof it was closed?
4. When did leadership last review safety data? What did they decide?

*If any answer is a shrug, that's where to start.*

## Where operators get caught

These seven come up again and again. Each has a plain fix.

| Where it goes wrong                                                                                     | The fix                                                                                                  |
|---------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| <b>A policy nobody lives by.</b> The binder says safety comes first. The schedule says otherwise.       | Make one visible call where safety beat schedule or cost, and write it down. People notice.              |
| <b>Hazards found only after something breaks.</b>                                                       | A standing 30-minute hazard review each month: reports, maintenance write-ups, crew debriefs.            |
| <b>Risk judged by gut.</b>                                                                              | One simple likelihood-and-severity matrix, used the same way every time, with the decision written down. |
| <b>Controls nobody checks.</b> You changed a procedure or added training but never confirmed it worked. | Decide what “working” looks like before you roll out the control. Then check.                            |
| <b>Corrective actions that drift.</b>                                                                   | A log with an owner, a due date, and proof of closure for every item. Review it monthly.                 |
| <b>Data collected and never read.</b>                                                                   | A quarterly look at trends. Even simple counts by category will show you something.                      |
| <b>Safety talk once a year.</b>                                                                         | A monthly meeting with minutes. Tell every reporter what happened to their report.                       |

## Doing it without adding headcount

For most small operators, SMS is a question of hours, not new hires. What makes the difference:

- **Use the people you have.** Part 5 requires named, accountable people. Small operators commonly double up: the owner as accountable executive, the director of operations or chief pilot as SMS lead. Confirm with your inspector how they expect to see it documented.
- **Fold it into meetings you already hold.** Thirty minutes at the end of your monthly operations meeting beats a new meeting nobody attends.
- **Keep the tools simple.** A shared folder, a spreadsheet for hazards and corrective actions, and a basic report form will carry a small operator a long way. Software can log and remind. It can’t make your safety decisions.
- **Keep the judgment with your people.** Risk ratings and safety decisions belong to the humans who know the operation. A tool that scores risk for you doesn’t change who answers for the decision.
- **Write it the way you actually fly.** Borrowed manuals fail the first crew interview. If your pilots and mechanics can’t describe a procedure in their own words, it isn’t implemented.
- **Schedule the work like a check ride.** Put SMS tasks on the calendar with owners and dates, or they will lose to the flight schedule every time.

# Check yourself

Check only what you can prove today, not what you intend to do. The frequencies below are working benchmarks, not FAA-mandated intervals.

## Safety Policy

- |                          |                                                                     |
|--------------------------|---------------------------------------------------------------------|
| <input type="checkbox"/> | Written safety policy, signed by the accountable executive          |
| <input type="checkbox"/> | Safety objectives specific to our operation, not generic            |
| <input type="checkbox"/> | Accountable executive and SMS lead named in writing                 |
| <input type="checkbox"/> | Leadership reviews safety data at least quarterly, with dated notes |
| <input type="checkbox"/> | Everyone in the company knows the policy and who to go to           |

## Safety Risk Management

- |                          |                                                                            |
|--------------------------|----------------------------------------------------------------------------|
| <input type="checkbox"/> | A documented way to find hazards (reports, maintenance findings, debriefs) |
| <input type="checkbox"/> | One consistent method for rating risk                                      |
| <input type="checkbox"/> | Documented controls for our top risks                                      |
| <input type="checkbox"/> | We check whether those controls actually work                              |
| <input type="checkbox"/> | We review hazards when we change aircraft, routes, bases, or key people    |

## Safety Assurance

- |                          |                                                                      |
|--------------------------|----------------------------------------------------------------------|
| <input type="checkbox"/> | Internal audits run at least annually, more often in high-risk areas |
| <input type="checkbox"/> | Incidents and serious events are investigated and written up         |
| <input type="checkbox"/> | Corrective actions have an owner, a due date, and proof of closure   |
| <input type="checkbox"/> | Safety data is reviewed for trends at least quarterly                |
| <input type="checkbox"/> | Findings feed back into our risk assessments                         |

## Safety Promotion

- |                          |                                                                  |
|--------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> | Everyone is trained on the SMS and their role, with records kept |
| <input type="checkbox"/> | Recurrent safety training is documented                          |
| <input type="checkbox"/> | Safety meetings happen at least monthly, with minutes            |
| <input type="checkbox"/> | Employees can report hazards without fear of reprisal            |
| <input type="checkbox"/> | Reporters hear back about what was done                          |

Count your checks. Every blank is a gap to close before May. As a rule of thumb (ours, not the FAA's), if you're under 16 of 20, treat your calendar as tight.

# Your runway to May 28, 2027

Here's a realistic path for an operator starting now. Adjust it to your size, but keep the order.

| By                                        | What gets done                                                                                                                                                                                                                         | Proof you'll have                                                           |
|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| <b>Now through November 2026</b>          | Confirm your status with your FAA inspector (implementation plan, SMSVP letter). Name your accountable executive and SMS lead. Sign the safety policy. Start a hazard list from maintenance write-ups, crew debriefs, and near-misses. | Signed policy. Named roles in writing. First hazard list.                   |
| <b>December 2026 through January 2027</b> | Rate every hazard on the list. Document controls for the significant ones. Turn on hazard reporting so people can actually use it. Open your corrective-action log.                                                                    | Risk register. Reporting channel live. First reports logged.                |
| <b>February through March 2027</b>        | Train everyone on the SMS and their part in it. Start monthly safety meetings. Run your first internal audit. Close your first corrective actions.                                                                                     | Training records. Meeting minutes. Audit report. Closed actions with proof. |
| <b>April 2027</b>                         | Second pass: review the data for trends, re-test your controls, close remaining gaps. Bring in someone outside your day-to-day for a mock inspection.                                                                                  | Trend review. Gap list. Mock findings addressed.                            |
| <b>May 2027, before the 28th</b>          | Assemble your evidence file. Leadership does a final review. Sign and submit the declaration of compliance to the FAA, through the channel your inspector confirms.                                                                    | Evidence file. Filed declaration.                                           |

This plan puts about five months of a running SMS behind your signature. That matters, because the declaration says the system is built and working. If you're reading this after the first of the year, the same steps apply. You'll just run them in parallel instead of in order. Don't wait for a perfect risk register before you start collecting hazard reports.

## Where you're starting from

**Starting from zero.** Follow the plan as written. The biggest risk is losing the first two months. Steps one and two cost you time, not money.

**Already have a program or an SMSVP letter.** Run the "Check yourself" list. Your work is likely proof and updates: evidence that your assurance process is actually running, and confirmation that your program meets current Part 5 requirements.

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## A word to Part 141 flight schools

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Straight answer first. If you operate as a Part 61 or Part 141 school and nothing else, Part 5 does not require you to have an SMS, and there is no May 28, 2027 deadline for you. If someone tells you otherwise, ask them to point you to the section.

### When it does apply

If your company also holds a Part 135 certificate or operates air tours under a Part 91.147 letter, such as a charter arm, the rule applies to that operation. Ask your FAA inspector how it reaches into the training side.

### Why some schools build one anyway

The FAA runs a voluntary program, the SMSVP, that is open to Part 141 schools, and many professional training organizations adopt a scaled SMS on their own. The four components fit training risks well: student progression, instructor oversight, stage-check findings, and training-aircraft maintenance. It's worth doing if it reduces risks you actually have. It isn't required.

### If you're already in the voluntary program

The FAA set May 28, 2025 for voluntary participants (other than Part 135 letter holders) to update their SMS to the current Part 5 requirements. If you're enrolled, confirm with your inspector that yours was updated.

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## Questions to ask before you hire anyone

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Some of you will want help. Some of you won't need it. Either way, put these questions to anyone who offers to build your SMS, including us.

1. **Have you worked inside a Part 135 operation, or only written about one?** Knowing the regulation and knowing how a small operator actually runs are different skills. You need both.
2. **Will the SMS be built around how we actually fly?** A template with our name on it won't survive the first crew interview.
3. **Who writes the documents, and can my people explain them in their own words?** If your crews can't describe a procedure, it isn't implemented.
4. **Where does the regulation end and your opinion begin?** A good advisor can show you which requirements come from Part 5 and which are best practice.
5. **What happens the day after you leave?** Someone on your staff should be able to run the monthly cycle without calling anyone.
6. **Will you tell me when something isn't worth doing?** You should hear "skip that" at least once.

*Ask us the same questions. We'd rather you did.*

## About Captain Bob

I'm Bob Wilson. I flew the B-52 in the Air Force and worked as a Part 135 captain, so I know what operational discipline looks like when it's real. I've also spent a career in Fortune 200 systems engineering and technology leadership, where I learned that a process nobody uses is worse than no process at all.

I run Solutioneering, where I work directly with aviation operators. If you'd like a second set of eyes on where you stand against the four components, reach out at **[solutioneering.ai](https://solutioneering.ai)**.

## Sources

- 14 CFR Part 5, Safety Management Systems.
- FAA final rule, Safety Management Systems, Federal Register, April 26, 2024 (Docket FAA-2021-0419): <https://www.federalregister.gov/documents/2024/04/26/2024-08669/safety-management-systems>
- FAA, Part 5 FAQ: From Industry: <https://www.faa.gov/media/96306>
- NBAA, FAA Part 5 SMS for Small Operators: A Practical Guide: <https://nbaa.org/flight-department-administration/sms/faa-part-5-sms-for-small-operators-a-practical-guide/>
- Business Jet Traveler, The Safety Question Worth Asking Before Your Next Charter: <https://www.bitonline.com/business-jet-news/the-safety-question-worth-asking-before-your-next-charter>

This guide is general information for aviation operators. It isn't legal advice or FAA guidance, and it doesn't replace 14 CFR Part 5 or the direction of your FAA principal inspector. Rules and dates were checked against FAA and industry sources in September 2026. Confirm your own status with your FAA office before you rely on any date here.