# Read-Me-First Document

Description of SMS Implementation Documents, Guidance and Tools - Rev. 8-05-09

## Purpose:

The "Read-Me-First Document" provides a short description of Safety Management System (SMS) related documents and a few specifics about each document as they relate to the world of voluntary SMS implementation, as a high-level summary.

## Overview:

This "Read-Me-First Document" is not a comprehensive list of all SMS documents.  It is a short list of relevant documents that pertain to an Aviation Service Provider (Airline, Air Carrier, Overhaul/Repair, Maintenance Repair Organization, etc.) or a Federal Aviation Administration (FAA) organization that oversees an Aviation Service Provider, who is contemplating or actively involved in the SMS Pilot Project or voluntary implementation of an SMS.  It is designed to be a one-stop-shop for pertinent SMS implementation documents and references.

It is envisioned that when, and if, the FAA develops formal rules requiring implementation of SMS by aviation service providers, most of these documents will **not** change significantly, as they will continually be revised to reflect current international and domestic thinking on safety management systems.

*The "Read-Me-First Document" document is laid out in order of frequency-of-use*, *rather than hierarchy of authorship*.  It is sequential in that it starts at the most frequently used documents and progresses to the less used, but higher authority (ICAO, FAA) documents and guidance tools designed to assist in the voluntary transition to SMS.  In this manner, it is designed to guide the reader through questions such as, "What do I need to do?", "What should a robust SMS should look like?", "Where did SMS come from?", etc.

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## Tabled List of Important Documents

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| ICAO | 1. ICAO Annex 1, 6, 8, 13 <br> 2. ICAO Safety Management Manual (SMM) Doc 9859 AN/474 <br> 3. ICAO Safety Oversight Manual Doc 9734a |
| FAA | 1. FAA Flight Plan 2008 – 2012 <br> 2. FAA Order 8000.369 - SMS Guidance (September 2008) <br> 3. FAA Order 8000.368 - AFS Oversight (June 2008) |
| AVS | 1. AVS Doctrine VS8000.1 – (**Cancelled April 2009**) <br> 2. FAA Order VS8000.367 - AVSSMS Requirements (May 2008) <br> 3. The Safety Management System Strategic Plan (July 2008) |
| AFS | 1. AC 120-92: Introduction to SMSs for Air Operators (June 2006) <br> 2. Voluntary Developmental Guidance (February 2009) <br>      a. SMS Framework for Aviation Service Providers <br>      b. SMS Assurance Guide <br>      c. SMS Implementation Guide <br>      d. Gap Analysis Tools (Preliminary and Detailed) <br>      e. SMS Guidebook (to be published fall 2009) |

## Web Resources

1. AFS SMS Pilot Project & Voluntary Implementation website:

   https://avssharepoint.faa.gov/afs/900/SMS/pilot/Forms/default.aspx

2. Safety Management Systems (SMS) for Airports website:

   http://www.faa.gov/airports/airport_safety/safety_management_systems/

3. ICAO Publications and Resources website:

   http://www.icao.int/anb/safetymanagement/Documents.html

4. ICAO SMS Training website:

   http://www.icao.int/anb/safetymanagement/training/training.html

5. National Air Transport Association (NATA) SMS website:

   http://www.natasafety1st.org/sms.htm

6. Transport Canada SMS website:

   http://www.tc.gc.ca/civilaviation/sms/menu.htm

7. Transport Canada Process to Assess Industry SMS website:

http://www.tc.gc.ca/CivilAviation/SMS/Training/Module9/menu.htm

8. Mitre SMS website:

   http://www.mitrecaasd.org/SMS/

9. National Business Aviation Association SMS website:

   http://web.nbaa.org/admin/sms/

10. Australian Government Civil Aviation Safety Authority SMS Training website:

    http://www.casa.gov.au/scripts/nc.dll?WCMS:STANDARD:1779027664:pc=PC_91435

11. Civil Aviation Authority of New Zealand SMS website:

    http://www.caa.govt.nz/SMS/SMS_home.htm

12. IATA Operation Safety Audit (IOSA) website:

    http://www.iata.org/ps/certification/iosa/

13. Civil Aviation Authority of Singapore website:

    http://www.caas.gov.sg/caasWeb/export/sites/caas/en/Regulations_And_Guidelines/Guidelines_and_Manuals/AFO/Reference_Materials/

14. ExxonMobil Europe SMS Program website:

    http://www.exxonmobileurope.com/Europe-English/community_roadsafety_management.aspx

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# SMS Framework

## Overview:

The purpose of the *SMS Framework* is to provide one standard framework (basic conceptual structure) for aviation organizations to use when voluntarily developing and implementing an SMS.  This Framework provides guidance for SMS development by aviation service providers (for example, airlines, air taxi operators, corporate flight departments, and pilot schools).  It provides a functional framework consisting of a set of requirements for SMS processes.

The *SMS Framework* is an interim document developed by the AFS SMS Program Office to temporarily replace AC 120-92, Appendix 1 and to provide a clearer understanding of components, elements and processes that are defined in terms of functional expectations, i.e., those characteristics that would be expected to be incorporated in a robust SMS.    The requirements were originally published as Appendix 1 to AC 120-92. The elements of that process were considered to be essential to development and implementation of an effective, comprehensive SMS for an aviation service provider's organization.  Functional expectations are further defined in terms of performance objectives and design expectations to better align with current system safety and ATOS models.

Even though an interim document, the *SMS Framework* is the "standard" for a robust SMS and should be followed in the implementation of a SMS for Service Provider's enrolled in the SMS Pilot Project.  Like AC 120-92, Appendix 1, the *SMS Framework* is an evolutionary document that was derived from international and domestic activities concerning SMS.  It follows FAA Order VS8000.367 and is itself followed by several reference documents and tools.  The *SMS Framework* contains the significant details of an SMS.  This is the first of three documents that will be used daily during implementation of the SMS.  The remaining two are the SMS Assurance Guide and the SMS Implementation Guide.  Both of these tools will be discussed below.

## Specifics:

AVS and AFS have conducted and continue to conduct, extensive dialogue with our domestic industry constituents as well as with foreign authorities and businesses that have FAA-issued certificates and other authorizations. The structure of the *SMS Framework* reflects four key issues:

1. To provide aviation service providers with a standardized set of concepts, documents, and tools for voluntary development and implementation of safety management systems;

2. To bring SMS standards for implementation of safety management systems into conformance with AVS policy in FAA Order VS 8000.367, appendix B;
3. To align the structure and format of Flight Standards documents and tools with the ICAO SMS frameworks, and;

4. To produce a set of documentation and tools that are internally mapped in a manner that is easier to use than the first generation of tools.

Except for changes in titles and a small number of changes to text, which were necessitated to align with the requirements in FAA Order VS 8000.367, the expectations in this document are unchanged from original guidance. They have however, been restructured to align with the structure of the ICAO Frameworks. Consequently, some text has been moved from the original placement. The *SMS Framework* is applicable to both certificated and non-certificated air operators that desire to develop and implement an SMS. The FAA views the objectives and expectations in the *SMS Framework* to be the minimum expectations for a robust SMS developed by an aviation service provider.

**Note:** The *SMS Framework* is not mandatory and does not constitute a regulation. Development and implementation of an SMS is voluntary. While the FAA encourages each aviation service provider to develop and implement an SMS, t**hese systems in no way substitute for regulatory compliance of other certificate requirements**.

# SMS Implementation Guide

## Overview:

The *SMS Implementation Guide* provides a detailed process for implementation of SMS functional expectations described in the *SMS Framework* by aviation service providers (air operators, aviation maintenance organizations, and flight training organizations). Additionally, it provides a three-level recognition system to attest to aviation service provider's participation in the SMS Pilot Project.

## Specifics:

The overall objective of the *SMS Implementation Guide* is to assist organizations in developing and implementing integrated, comprehensive SMSs for their entire organizations. Specifically, it will help ensure that an organization's SMS will be capable of:

> a. Receiving safety input from internal and external sources and integrating that information into their operational processes;

> b. Establishing and improving organizational safety policy to the highest level;

> c. Identifying, analyzing, assessing, controlling and mitigating safety hazards;

> d. Measuring, assuring and improving safety management at the highest level;

> e. Promoting an improved safety culture throughout their entire organization; and

> f. Realizing a return on SMS investment through improved efficiency and reduced operational risk.

The *SMS Implementation Guide* will also assist FAA Certificate Management Teams (CMTs) in evaluating organizations' SMS programs and participating in further development of implementation and oversight strategies.

The phases of implementation will be arranged into four levels, to assist the aviation service provider in developing and implementing an integrated, comprehensive SMS for its entire organization.

The SMS Implementation Guide's first 4 Appendixes detail the objectives, inputs, procedures and outputs for Levels 1 through 4 of phased SMS implementation.

Appendices 5 & 6 are the Preliminary Gap Analysis Tools and the Detailed Gap Analysis Tools, respectively (each is explained in their respective summary, below).
Appendix 7 and beyond are reference documents to further assist in SMS implementation. The *SMS Implementation Guide* is the third of three documents that will be used daily during implementation of the SMS (the other two being the *SMS Framework* and the *SMS Assurance Guide*).

# SMS Assurance Guide

## Overview:

The *SMS Assurance Guide* has been developed by the AFS SMS Program Office for assessment of the design and performance of aviation service providers' SMS programs. The guide simply expresses the objectives and expectations of the *SMS Framework* in the form of a question and is intended to be used whether the assessments are being conducted by the aviation service providers themselves, in internal audits and evaluations or by third parties.

The guide is organized in accordance with the Flight Standards *SMS Framework*, which shares structure and organization with the International Civil Aviation Organization (ICAO). The FAA *SMS Framework* embodies the requirements expressed in FAA Order VS 8000.367, *Safety Management System Requirements*, with focus on Chapter 5 and Appendix B.

The *SMS Assurance Guide* is a tool to assist aviation service providers (for example, airlines, maintenance repair organizations, air taxi operators, corporate flight departments, and pilot schools) in the application of the FAA *SMS Framework*.

## Specifics:

The *SMS Assurance Guide* is applicable to both certificated and non-certificated air operators that desire to develop and implement an SMS. An SMS is not currently required for U.S. certificate holders. The FAA views the objectives and expectations in the *SMS Assurance Guide* as beneficial to aviation safety, and therefore the supports the entire SMS Framework being a minimum level of development for an efficient and functional SMS implemented by an aviation service provider. Operators may however, establish additional or more stringent requirements.

The *SMS Assurance Guide* describes the objectives and expectations for an aviation service provider's SMS in a work process flow. Inputs from a pervious process are followed by the process owner designation, procedures to be followed, outputs to the next process, controls to ensure desired output and finally performance measures to ensure consistent results.

The Assurance Guide also provides guidance for conducting gap analyses and subsequent assessments of SMS programs for the SMS Pilot Projects (SMSPP).
This is the second of three documents that will be in daily use during implementation of the SMS.

**Note:** The *SMS Assurance Guide*, like the *SMS Framework* is not mandatory and does not constitute a regulation. Development and implementation of an SMS is voluntary. Meeting the performance objectives and design expectations of the SMS Assurance Guide will satisfy the Performance Objectives and Design Expectations of the *SMS Framework*. While the FAA encourages each aviation service provider to develop and implement an SMS, t**hese systems in no way substitute for regulatory compliance of other certificate requirements**.

# FAA AFS SMS Guidebook

<u>**Overview:**</u>
The *SMS Guidebook* will be the repository for expanded guidance, detailed instructions and best practices for use in the implementation of an SMS for an aviation service provider (air carrier, maintenance repair organization, etc.). The target completion is Fall 2009.

<u>**Specifics:**</u>
The purpose of the *SMS Guidebook* will be to provide organized and developmental guidance to aid service provider organizations in defining their organization's SMS. The *SMS Guidebook* will provide a roadmap for developing and implementing a SMS. It will contain a logical, structured, methodical, and auditable process that provides measures to enable an organization to value and use safety standards in much the same manner that the organization values and uses financial reports.

# Preliminary SMS Gap Analysis Tool
(Appendix 5 – SMS Implementation Guide)

<u>**Overview:**</u>
The *Preliminary Gap Analysis Tool* is a simple spreadsheet that is designed to assist aviation service providers in conducting their initial high level assessment on its existing organizational programs, systems, and activities with respect to the components, elements and processes found in FAA *SMS Framework* functional expectations.

This is the first of a set of tools designed to assist the aviation service provider, and the FAA organization responsible for oversight, in evaluating the differences ("gaps") between where the aviation service provider's processes are now and where they need to be under a robust SMS. This is a "first look" tool.

<u>**Specifics:**</u>
This is a high level assessment of the four Components, twelve Element and seventeen Process "Performance Objectives" as found in the "*SMS Framework*" that is currently being used in lieu of Appendix 1 to AC 120.92, by Pilot Project Participants. Specifically, the aviation service provider's top management will provide their "best guess" assessment of where they stand in relation to each Component, Element and Process in the Preliminary Gap Analysis tool. This serves as a starting place for the organization to do a high-level evaluation of the gaps between what their operational departments already have in place, compared to what the SMS Framework requires. The in-depth evaluation will be done at a later time when they conduct their *Detailed Gap Analysis*, as described below.

The *Preliminary Gap Analysis Tool* may also be used as an SMS executive tracking tool, if it is continuously updated with the results from the *Detailed Gap Analysis Tool*. There are two electronic *Preliminary Gap Analysis Tools*; one for Air Operators, and one for Maintenance Repair Organizations (MRO's).

# Detailed SMS Gap Analysis tool
(Appendix 6 – SMS Implementation Guide)

### Overview:

The second, and last set of tools designed to assist the aviation service provider, and their oversight FAA organization, in evaluating the differences ("gaps") between where the service provider's processes are now and where they need to be under a robust SMS. This is a very detailed evaluation and addresses all four Components, twelve Elements and seventeen Processes of the *SMS Framework*.

### Specifics:

This is a tool that was initially developed from the Data Collection Tools (DCTs) concept utilized by Air Transportation Oversight System (ATOS)/Surveillance and Evaluation Program (SEP) monitored service providers.

As alignment with the ICAO SMS Standard evolved, the *Detailed SMS Gap Analysis Tool* evolved and will assist with a detailed analysis of the operator's objectives and expectations of the Components, Elements and Processes found in the FAA *SMS Framework* functional expectations. Recall that the *SMS Framework* is currently being used in lieu of Appendix 1 to AC 120.92, by Voluntary SMS Implementation Pilot Project Participants. The *Detailed Gap Analysis* expectations and questions are based on the detailed requirements (at the Element and Process levels) of the FAA *SMS Framework*, and aligned with the *SMS Assurance Guide*.

All aviation service providers should use both the preliminary and the detailed analysis tools, with the preliminary tool serving as an SMS executive tracking tool (if it is continuously updated with the results from the detailed gap analysis).

There are two electronic *Detailed Gap Analysis Tools*; one for Air Operators, and one for MRO's.

# Advisory Circular 120-92
Introduction to Safety Management Systems for Air Operators

## Overview:

AC 120-92 is an evolutionary document that was derived from international and domestic activities (FAA Order VS8000.367) concerning SMS. Appendix 1 has been referred to as a "standard" for the voluntary implementation of SMS by the SMS Pilot Project enrollees. Although AC 120-92 is a current document in the FAA database, the Voluntary Implementation Pilot Projects have discontinued its use, in favor of the *SMS Framework*. The *SMS Framework* is being submitted as a revision to AC 120-92's Appendix 1. While the revision process is underway for AC 120-92, the *SMS Framework* is used as the baseline document. AC 120-92, Appendix 1 contained the significant details of an SMS and is superceded by the *SMS Framework for all practical purposes*.

# FAA Order VS 8000.367
Aviation Safety (AVS) Safety Management System Requirements

## Overview:

This FAA Order provides the internal (to the FAA) SMS details and refers users to Appendix B, which guides aviation service providers toward SMS Requirements. **This is the first document that provides detailed guidance for voluntary implementation of SMS**. Chapter 5 of this document addresses oversight, thus Chapter 5 and Appendix B are of most interest to Service Providers and their Oversight Management Offices.

## Specifics:

This Order defines the requirements for the SMS in AVS and fulfills the requirement described in *FAA Order VS 8000.1, Safety Management System (SMS) Doctrine, Section 1-1.c. (2).*

This Order describes the functional requirements for the AVS SMS. Each AVS FAA office with oversight responsibilities for aviation service provider organizations must publish SMS requirements specific to those organizations, which it oversees, e.g., Flight Standards Service (AFS) must develop and publish requirements for SMSs in air operator organizations, (i.e., *Advisory Circular 120-92*). These requirements must be consistent with the requirements described in Appendix B, referenced below.

**Appendix B: Product/Service Provider SMS Requirements.** This Appendix establishes the minimum set of requirements that must be developed for constituent aviation service provider organizations for which AVS services have oversight responsibility. This is sometimes called the "External SMS".

# FAA Order 8000.368
Safety Management System Guidance for Flight Standards

**Overview:**
This Order provides guidance for AFS staff and offices in meeting the requirements specified in FAA Order VS 8000.1, Safety Management System Doctrine.

**Specifics:**
This Order describes AFS statutory responsibilities with respect to aviation safety oversight and evolving system safety and SMS based initiatives. These initiatives contribute to enhanced methodologies for managing risk and improving safety in aviation. Additionally, this order discusses the incorporation of these system safety and SMS concepts into the future AFS oversight approach.

# FAA Order 8000.369
Safety Management System Guidance

**Overview:**
This Order is basically a "clone" of the original VS 8000.1 (AVS SMS Doctrine) taken up one level to make it an overall FAA doctrine. It didn't add anything new from a conceptual standpoint but it should be referenced as an FAA-level foundational document.

**Specifics:**
This order provides guidance for implementation of a SMS within the FAA. Additionally, this order required the development and implementation of a plan for functions under SMS, including the structure of safety oversight relationships with the segment of industry for which it holds oversight responsibility.

The AVSSMS doctrine is derived in part from the statutory authority in *Title 49 of the United States Code (49 U.S.C.), Section 40101(d), Chapter 447 of subpart III, part A, subtitle VII, and Section 44702, and Title 14 of the Code of Federal Regulations (14 CFR).* This doctrine is based on *ICAO Annex 6* as well as *ICAO Doc 9859*.

# FAA Order VS 8000.1 (Cancelled April – 2009)
AVS Safety Management System Doctrine (AVSSMS)

**Overview:**
This order provided early doctrine for FAA AVS services/offices to implement a common AVS SMS.This Order has been superceded by FAA Order 8000.369, and was cancelled, in mid-April, 2009. Order VS 8000.1 provided early doctrine for implementing SMS within the FAA. It followed the ICAO documents and spawned the FAA guidance material. It was the highest FAA document concerning SMS, **and is included here because it is still reference by several other FAA SMS Orders**, thus is important to know the genesis and current status.

# InFO Notice 08022

FAA Safety Management System (SMS) developments – No. 1

**Overview:**

The purpose of this Notice was to make known to certificate holders such as air carriers, 14 Code of Federal Regulations (CFR), part 142 training centers, and 14 CFR part 145 repair stations of the coming implementation of SMS worldwide, and to recommend reference materials they may use to prepare for their own implementation.

**Specifics:**

The aviation world – operators and regulators alike – is moving toward SMS as a means to manage safety in operations and to guide regulatory oversight. The ICAO has endorsed SMS by entering pertinent requirements in Annex 6, Operation of Aircraft, and in Annex 8, Maintenance of Aircraft. ICAO SMS requirements for aircraft and maintenance operations stipulate that nations should put SMS programs into effect beginning January 1, 2009. ICAO recognizes that a shift to SMS practice worldwide will not be instantaneous; thus ICAO recommends "phased implementation" of SMS programs by certificate holders and regulators. This InFO Notice introduced the two current (at the time –May, 2008 – since updated by the *SMS Framework* and supporting Voluntary Guidance) two official publications for use by a certificate holder in developing an SMS that is appropriately scaled to the scope of its unique operations: AC 120-92 and the ICAO Document 9859, Safety Management Manual (SMM).

# InFO Notice 08053

FAA Safety Management System (SMS) developments – No. 2

**Overview:**

*This Notice alerted Flight Standards employees that at present, there are no authorized provisions for FAA approval or acceptance of SMS programs.*

The purpose of this Notice was to provide current information on SMS implementation with respect to the January 1, 2009 compliance date. Formal FAA guidance material is still under development. There is now a formal recognition mechanism for those Voluntary Pilot Project Participants, as they achieve each of the phased implementation levels. Details can be found in the *SMS Implementation Guide*.

**Specifics:**

This Notice was published in November, 2008, as Flight Standards observed confusion experienced by both Flight Standards Certificate Holding District Offices (CHDOs), as well as Certificate Holders and Operators that were unclear if they were required to submit an SMS Program to their respective FAA Oversight Office. Similarly, the FAA oversight offices were unclear whether to accept, or approve SMS Programs, or conversely to decline acceptance or approval if any mention of an SMS was referenced or included in Certificate Holder manuals.

# ICAO Doc 9859
The ICAO Safety Management Manual (SMM)

**Overview:**
This manual follows Annex 6, Part 1, below, and provides more detailed guidance and standardization for member states when implementing SMS, either internally (within an oversight organization, i.e. the FAA) or externally (within a Service Provider, i.e. an air carrier or MRO).  The SMM is an excellent resource and has generic developmental guidance information that should be considered.

**Specifics:**
This Manual is intended to provide ICAO Member States with guidance to develop the regulatory framework and the supporting guidance material for the implementation of SMS by Service Providers (Air Carriers). It also provides guidance for the development of a *State Safety Program (SSP)*, in accordance with *International Standards and Recommended Practices (SARPs)* contained in Annex 6 – Operation of aircraft.

ICAO Doc 9859 (SMM) can be downloaded directly from the ICAO site:

 http://www.icao.int/anb/safetymanagement/Documents.html


# FAA Order FS1100.1A, Chapter 11, Para. 5
# Flight Standards Service Organizational Handbook

**Overview:**
This Order describes Flight Standards' Organizations and their responsibilities.  Chapter 11, Paragraph 5 codifies the Flight Standards SMS Program Office (PO) and its duties responsibilities.

**Specifics:**
The FS SMS PO provides policy and guidance on AFS internal and external SMS requirements and interfaces. The SMS PO provides support to the AFS Director, Deputy Director, and Executive Steering Committee in execution of the AFS SMS doctrine. The SMS PO interfaces with the AVS SMS Working Group and is responsible for SMS concept development in accordance with AVS SMS doctrine and standards.

The SMS PO provides direction, guidance, and coordination with points of contact in headquarters and field divisions in development of SMS policies, procedures, and work instructions, in accordance with the AVS Quality Management System (QMS). The office is responsible for SMS standardization and development of training requirements. Specific functions and responsibilities of the SMS PO are delineated in Chapter 11, Paragraphs 5 (a-n).

# International Civil Aviation Organization (ICAO) Annex 6

International Standards and Recommended Practices (SARP)
Annex 6 to the Convention on International Civil Aviation
Part I - International Commercial Air Transport — Aeroplanes

## Overview:

ICAO is the United Nations Organization that issues international standards related to civil aviation. It bases its authority on the Chicago Convention, an international treaty. As administrators of the treaty, ICAO's standards have the weight of the treaty itself. Member states have agreed to abide by the ICAO Annexes, which deliver the standards as specific to the various components of the air transportation system (e.g. manufacturing, air traffic, airports, operations, licensing, etc.).

## Specifics:

Annex 6 brought "official" life to the international aviation arena's awareness of SMS. International Standards and Recommended Practices (SARP) is the source document that requires member states (The United States is a member state) to:

Chapter 3.2.1 - States shall establish a safety program in order to achieve an acceptable level of safety in the operation of aircraft.

Chapter 3.2.4 - From 1 January 2009, States shall require, as part of their safety program, that an operator implement a safety management system acceptable to the State of the Operator that, as a minimum:

   a) Identifies safety hazards;

   b) Ensures that remedial action necessary to maintain an acceptable level of safety is implemented;

   c) Provides for continuous monitoring and regular assessment of the safety level achieved; and

   d) Aims to make continuous improvement to the overall level of safety.

This document refers to the ICAO *Guidance on safety management systems,* which is contained in the *Safety Management Manual (SMM) (Doc 9859),* referenced above.

# FAA Order 1110.152

Safety Management System (SMS) Aviation Rulemaking Committee

## Overview:

This Order constitutes the charter for the SMS Aviation Rulemaking Committee (ARC) that is designated and established pursuant to the Administrator's authority under Title 49 of the United States Code, Section 106(p)(5).

## Specifics:

FAA Order VS 8000.367 ("AVS SMS Requirements") is the basis for the ARC's work on how AVS will address its responsibilities for management and oversight of its regulated aviation service providers.