



TrustFlight

THE COMPLETE SMS BLUEPRINT

What the FAA Actually Expects from Your Part 5 SMS

**A practical guide for Part 135 operators navigating the gap between
compliance and genuine safety management**

April 2026

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Executive Summary

On May 28, 2027, every Part 135 operator in the United States must have a fully implemented Safety Management System compliant with 14 CFR Part 5 and must submit a Declaration of Compliance to the FAA.

That deadline is now roughly thirteen months away.

For many operators, the instinct is to solve this problem the fastest way possible: purchase software, download a template, populate the fields, and move on. The FAA has been explicit that this approach will not work.

Advisory Circular 120-92D, published alongside the final rule in May 2024, makes clear that operators cannot buy a generic software package or adopt an off-the-shelf manual and consider themselves compliant. Part 5 is a performance-based regulation. It describes what must be achieved, not how. That means every operator's SMS must be tailored to its own operational environment, risk profile, fleet, route structure, and people.

This matters because the consequences of getting it wrong are not abstract. Operating without a compliant SMS after the deadline is a regulatory violation that puts your operating certificate at risk. And the FAA will not simply check whether you filed the paperwork. Inspectors will evaluate whether your system is actually functioning: whether your people understand it, whether your leadership is engaged, and whether your risk management processes are producing real outcomes.

Who is this document for?

This white paper is written for Part 135 operators with five or more aircraft, the mid-market and enterprise operators whose operational complexity makes SMS implementation both more challenging and more valuable. It examines what Part 5 actually requires, why off-the-shelf solutions fall short, what a decade of global SMS implementation has revealed, and how to build an SMS that satisfies the regulator and genuinely improves your operation.

THE REGULATORY LANDSCAPE

What Part 5 Actually Requires

The FAA published its final rule expanding 14 CFR Part 5 on April 26, 2024. The rule took effect on May 28, 2024, extending the SMS mandate, previously applicable only to Part 121 carriers, to all Part 135 commuter and on-demand operators, Part 91.147 commercial air tour operators, and certain Part 21 design and manufacturing organizations.

The compliance timeline is structured around two milestones. Operators were required to submit an implementation plan to the FAA by November 28, 2024. Full SMS implementation and a Declaration of Compliance must be submitted by May 28, 2027. The FAA originally proposed a 24-month compliance window but extended it to 36 months in response to industry feedback about the burden on smaller operators.

The Four Components

Part 5 is organized around four integrated components, each codified as a separate subpart:

- **Safety Policy (Subpart B)** establishes the foundation. The operator must document a safety policy signed by the accountable executive, define accountability structures, and establish a confidential employee reporting system where personnel can report hazards without concern of reprisal. The accountable executive must be the final authority over operations and must retain ultimate responsibility for safety performance. This is not a title. It is a regulatory obligation with personal accountability.
- **Safety Risk Management (Subpart C)** is the analytical core. Operators must implement a systematic process for identifying hazards, analyzing the likelihood and severity of associated risks, and designing controls when risk is unacceptable. SRM must be applied to planned operational changes, identified hazards, and any event that exceeds acceptable safety risk. This is proactive and prospective work, not reactive incident investigation.
- **Safety Assurance (Subpart D)** requires continuous monitoring and measurement of safety performance through audits, investigations, employee reporting data, and trend analysis. The organization must assess whether performance meets its stated safety objectives and demonstrate continuous improvement through corrective and preventive actions.
- **Safety Promotion (Subpart E)** addresses the human dimension. Operators must provide training to ensure personnel attain and maintain the competencies necessary for their SMS-related duties, and must develop means for communicating safety information throughout the organization. The FAA defines competency as observable and measurable actions, not simply attendance at a training session.

The Declaration of Compliance

The Declaration of Compliance is the culmination of the SMS development process, not its starting point.

Operators must have a fully functional, compliant system before submitting. Once submitted, FAA oversight begins immediately. Inspectors will add SMS-specific surveillance questions to the operator's oversight tools and will verify that documented processes match actual daily operations.

The regulatory environment is also intensifying. In February 2026, the Senate Commerce Committee passed the FAA SMS Compliance Review Act, directing the FAA to establish an independent expert review panel for agency-wide SMS. This signals that Congressional scrutiny of SMS implementation is increasing, not decreasing.

THE OFF-THE-SHELF TRAP

Why the FAA Says You Can't Buy Compliance

The market is flooded with SMS solutions ranging from \$30-per-month checklist tools to enterprise platforms costing thousands monthly.

Many promise fast compliance. Some claim you can complete your Declaration of Compliance in under an hour. The appeal is understandable. Operators are busy running their businesses, and a quick technological fix feels like the most efficient path.

The problem is that the FAA has anticipated exactly this response, and has rejected it.

What the FAA Has Said

AC 120-92D emphasizes that Part 5 is a performance-based rule.

It describes a desired end state but does not prescribe the specific means for achieving it. This flexibility is deliberate, and it cuts both ways. It means operators can design an SMS that fits their specific operation. It also means a generic system that could belong to any operator will not satisfy the requirement.

The FAA expects each organization to develop an SMS tailored to its operational context, scale, and risk profile.

An SMS that looks identical to another operator's system will raise questions during oversight. Documentation must describe the certificate holder's actual systems and processes. A purchased generic manual that does not reflect how the operator actually works will fail scrutiny.

What Inspectors Will Actually Look For

Once an operator submits its Declaration of Compliance, FAA inspectors will evaluate substance, not paperwork. They will check whether:

- The accountable executive can articulate their personal obligations and demonstrate active engagement with the SMS
- Safety Risk Management is being applied to operational changes, not just documented in a procedure manual
- The employee reporting system is actually generating reports, and those reports are producing action
- Safety Assurance processes are identifying trends and driving continuous improvement, not just filing data
- Training is producing demonstrated competence, not just completion certificates
- The SMS is a living system integrated into daily operations, not a binder on a shelf or a software dashboard no one checks

Why This Matters for Your Operation

For operators with five or more aircraft, especially those operating across multiple bases, the gap between template compliance and genuine implementation is significant.

A generic risk matrix does not account for the specific hazards of your route structure. A standard reporting form does not reflect the operational culture at your bases. A one-size-fits-all training program does not address the competency gaps in your specific workforce.

The operators most vulnerable to enforcement action after May 2027 will not be those who did nothing. They will be those who purchased a solution, checked the boxes, and assumed they were covered, only to discover during an FAA evaluation that their documented SMS bears little resemblance to how their operation actually functions.

What a Decade of Global SMS Has Taught Us

Part 135 operators are not the first to face an SMS mandate. Part 121 airlines in the US have been operating under Part 5 since 2018.

Internationally, aviation authorities in Europe, Canada, and Australia have mandated SMS across their industries for years. Their experience offers critical lessons.

Transport Canada: Ten Years of Data

Canada was the first major aviation authority to mandate SMS and conducted a comprehensive evaluation in 2017-2018, covering more than a decade of implementation. The findings are the richest dataset available on what works, what fails, and what surprises operators along the way.



The clearest success was non-punitive reporting. Among all the SMS elements evaluated, confidential reporting culture produced the most measurable improvement. Organizations that built genuine trust in their reporting systems, where employees felt safe discussing problems without fear of reprisal, consistently outperformed those that treated reporting as a compliance checkbox.

Small operators struggled disproportionately. Only 53% of small organizations rated SMS as important, compared to 84% of medium and large operators. Documentation burden was the most frequently cited challenge, with 41% of small organizations identifying it as a barrier. Fifty-nine percent of organizations relied on manual processes and spreadsheets for data management. And critically, some organizations inappropriately assigned low-risk ratings to incidents to avoid resource-intensive investigations, directly corrupting the Safety Risk Management process.

Implementation guidance mattered enormously. Transport Canada significantly underestimated the personnel and oversight resources needed to support industry implementation. Guidance was described as “unclear and non-specific,” and operators turned to external consultants and industry associations far more often than they used the regulator’s own documentation. Different regional inspector interpretations created inconsistent compliance standards and ongoing industry frustration.

The bottom line: Organizations that invested in genuine safety culture saw real results. Those that treated SMS as a paperwork exercise achieved compliance on paper but failed to improve safety outcomes.



The European Union Aviation Safety Agency has progressively extended SMS requirements across its industry, most recently to Part 145 maintenance organizations and Part 21 design and production organizations.

What Auditors Are Finding

Recent EASA inspections have produced findings directly relevant to US operators:

- Compliant SMS was associated with a 20% reduction in incident rates. One organization achieved a 30% reduction in runway incursions.
- Effective management of change produced measurable results: one organization saw a 100% decrease in ground handling damage incidents while traffic increased.
- However, auditors consistently found a disconnect between compliance monitoring and SMS, where findings from compliance audits rarely made it to SMS hazard registers, and safety issues seldom triggered compliance reviews.
- Risk assessment frameworks that used generic definitions without customization caused confusion and undermined the process.

What Part 121 Airlines Demonstrated

Airlines with voluntary reporting programs such as ASAP (Aviation Safety Action Program) receive ten to thirty times more safety reports per employee than those without such programs.

FOQA (Flight Operational Quality Assurance) programs analyze hundreds of flight parameters, generating the data foundation that makes predictive safety management possible.

The lesson is consistent across every jurisdiction: SMS works when it is built on genuine safety culture, active leadership engagement, and operational integration. It fails when treated as a documentation exercise or a software deployment.

THE THREE DIMENSIONS OF REAL SMS

Culture, Process, Technology

Part 5 compliance requires three interdependent dimensions working together.

Weakness in any one undermines the other two.

Safety Culture: The Foundation the FAA Cares Most About

Dr. James Reason's safety culture model, adopted by the FAA in AC 120-92D, identifies five characteristics of a positive safety culture:

- **Informed culture:** Personnel understand the risks in their operations and have access to safety data
- **Reporting culture:** Employees report errors, hazards, and concerns without fear of punishment
- **Just culture:** The organization distinguishes between honest mistakes, at-risk behavior, and willful negligence with proportionate responses
- **Flexible culture:** Authority shifts to domain experts when operational conditions demand it
- **Learning culture:** The organization uses data from reports, audits, and investigations to learn and improve

These are not aspirational qualities. They are operational requirements. An SMS without a functioning reporting culture has no data.

Without just culture, employees will not report. Without a learning culture, reports produce no action. The FAA will evaluate whether these cultural elements exist in practice, not just in your safety policy document.

Transport Canada's evaluation reinforced this: non-punitive reporting was the single clearest predictor of SMS success. The operators who got culture right got everything else right. The operators who skipped culture and went straight to documentation and technology found themselves with systems that looked compliant but produced no safety improvement.

Process: The Architecture That Makes It Operational

Each of the four Part 5 components requires defined, documented processes that are consistently followed. Safety Risk Management needs a structured methodology for hazard identification, risk analysis, and control design.

Safety Assurance needs audit cycles, data analysis protocols, and management review cadences. Safety Promotion needs training curricula mapped to competency requirements and communication channels that actually reach frontline personnel.

These processes must be tailored to your operation. A charter operator flying single-pilot IFR in mountainous terrain faces different hazards than a multi-crew air ambulance service operating 24/7 across six bases. Your SRM process, your risk matrix, your reporting categories, and your training content must reflect your actual operational environment.

Technology: The Enabler, Not the Solution

Technology plays a critical role in SMS, particularly for operators with multiple aircraft and bases. You cannot run effective Safety Assurance on spreadsheets at scale. You cannot track corrective actions, analyze trends, manage audits, and distribute safety communications across a multi-base operation using email and shared drives.

But technology is the enabler, not the solution. A platform can provide the infrastructure for hazard reporting, risk management workflows, audit tracking, document control, and safety performance dashboards. What it cannot provide is the safety culture that makes people report, the leadership engagement that drives resource allocation, the training that builds demonstrated competence, or the consulting expertise that designs processes tailored to your operation.

The operators who succeed will be those who invest in all three dimensions, not those who mistake one for the whole.

THE MULTI-BASE CHALLENGE

Why Complexity Changes Everything

For operators with ten or more aircraft, often spread across multiple bases, SMS implementation takes on a different character entirely.

The challenges that a single-location operator faces are compounded by distance, data fragmentation, and cultural variation.

Scattered Systems and Data Fragmentation

Many multi-base Part 135 operators run on a patchwork of spreadsheets, paper forms, and disparate platforms across their locations.

Safety reports, risk assessments, and compliance data end up scattered, leaving gaps in risk management that are invisible until an incident exposes them. Without a centralized system, maintaining a single source of truth for SMS documentation is extremely difficult.

Standardization vs. Local Reality

Part 5 requires that SMS processes be controlled, current, and consistently applied.

For operators with aircraft and personnel at multiple bases, ensuring every base follows identical procedures, uses the same hazard reporting methods, and maintains the same documentation standards is a major operational challenge. At the same time, each base may face unique local hazards, weather patterns, terrain, and operational profiles that the SMS must accommodate.

Cross-Base Safety Culture

Building genuine trust in a confidential reporting system is harder when management is not physically present.

Cultural differences between bases, different levels of local management engagement, and varying operational pressures all create inconsistencies. An employee at a remote base may have a very different relationship with the safety reporting system than one at the headquarters location.

What the FAA Will Expect

For operators at this scale, the FAA will assess cross-base consistency: whether Safety Risk Management is applied uniformly, whether Safety Assurance covers all locations, whether reporting rates are comparable across bases, and whether training is delivered and tracked consistently.

A compliant SMS for a multi-base operation requires centralized oversight with local accessibility, a combination that paper-based systems and disconnected tools simply cannot deliver.



A PRACTICAL ROADMAP

From Gap Analysis to Declaration of Compliance

With thirteen months remaining, operators who have not yet started SMS implementation are working within a compressed timeline. It is achievable, but only with a structured approach and clear milestones.

Phase 1: Understand (Months 1-3)

Before building anything, you need an honest assessment of where you stand today. This means a formal gap analysis against Part 5 requirements, covering all four components. For multi-base operators, this assessment must include cross-base consistency, departmental integration, and reporting culture maturity.

The output should be a clear matrix: here is what Part 5 requires, here is where you are, here is what you need to do. This becomes your implementation roadmap with prioritized actions.

A safety culture baseline assessment is equally important. Understanding your organization's current reporting behaviors, leadership engagement levels, and just culture maturity will determine how much work the Safety Promotion component requires.

Phase 2: Build (Months 4-9)

With the roadmap in hand, the build phase focuses on four workstreams:

- **SMS documentation:** Safety policy, SRM procedures, safety assurance program, safety promotion plan, all tailored to your specific operation
- **Risk management framework:** Hazard identification methodology, risk analysis criteria, and control effectiveness monitoring designed for your operational environment
- **Assurance program:** Internal audit cycles, data analysis processes, management review cadence, and corrective action tracking
- **Technology deployment:** Configuring your SMS platform around your operation, not adopting a generic template

Phase 3: PowerUp (Months 10-13)

The final phase ensures your people are as ready as your system.

This includes leadership engagement training for the accountable executive and senior management, practitioner training for safety managers and investigators, and frontline training that builds the reporting habits and just culture behaviors that make SMS functional.

Health checks and readiness validation before the compliance date confirm that the system is operating as documented, that personnel can demonstrate competence, and that the organization is prepared for FAA oversight.

The Critical Point

The operators who start with a gap analysis in the next 60 days will have the most time and the most options.

Every month of delay compresses the timeline and increases the risk of building a system that looks compliant on paper but cannot withstand scrutiny.



THE TRUSTFLIGHT APPROACH

Integrated Consulting, Training, and Technology for Part 5 SMS

TrustFlight is the Aerospace Safety Intelligence Platform, integrating safety technology, specialist training and consulting, and operational expertise into a single connected capability.

For Part 135 operators facing the Part 5 SMS mandate, TrustFlight delivers what the regulation actually demands: demonstrated competence, leadership engagement, active safety culture, and purpose-built technology, from one partner.

Why Integration Matters

The market today offers two categories of SMS solution: software vendors who sell platforms and may bolt on some generic training, and consulting firms who build documentation and recommend third-party technology. Neither approach delivers what Part 5 requires on its own.

Software platforms provide infrastructure but cannot build the safety culture that makes people report, train leadership on their personal regulatory obligations, or design risk management processes tailored to your operation. Consulting firms can write your manuals and coach your team but cannot give you the technology to operationalize SMS at scale across multiple bases.

TrustFlight is the only provider in the market that brings both together, not as two vendors stitched into a partnership, but as integrated capabilities within a single platform designed from the ground up to deliver exactly what regulators expect.

The Understand, Build, PowerUp Methodology

TrustFlight's Part 135 SMS Programme follows a proven three-phase methodology mapped directly to the four Part 5 components:

Understand delivers a comprehensive FAA Part 5 gap analysis, safety culture baseline assessment, and tailored implementation roadmap. For multi-base operators, this includes cross-base consistency evaluation, departmental integration assessment, and reporting culture maturity analysis. The output is a clear matrix showing what Part 5 requires, where the operator stands today, and exactly what needs to happen to close the gaps.

Build delivers the SMS documentation suite, risk management framework, safety assurance program, and Centrik 5 deployment, all configured around the operator's specific fleet, route structure, base locations, and risk profile. Documentation is not templated. It is designed to reflect how the operation actually functions, which is precisely what FAA inspectors will verify.

PowerUp delivers the human side of SMS: leadership and practitioner training, safety culture activation, and ongoing health checks that ensure the system is not just built but living. This phase ensures the accountable executive and senior leadership understand and fulfil their personal regulatory obligations, that safety managers and investigators have demonstrated competence in SMS processes, and that frontline personnel are actively engaged in reporting and risk management.



TRUSTFLIGHT'S TRAINING AND EXPERTISE CAPABILITY

BAINES SIMMONS

SAFETY SERVICES

Baines Simmons is TrustFlight's training and consulting capability, and a global leader in aviation safety training.

With 25 years of specialist aerospace expertise, more than 750 organizations served, over 40 regulatory authorities advised, and 200,000 professionals trained worldwide, Baines Simmons brings a depth of SMS implementation experience that no software vendor can match.

For the US market, Baines Simmons delivers the following courses and services, all adapted specifically for 14 CFR Part 5 with FAA regulatory references and content mapped to Subparts B through E. All courses are available as virtual instructor-led sessions.

**Pathway to Operating: Gap Analysis and Assessment** 1 Day

A structured assessment of your operation against Part 5 requirements, producing a prioritized implementation roadmap. For multi-base operators, this covers cross-base consistency, departmental integration, and reporting culture maturity. This is the recommended starting point for any operator that has not yet begun formal SMS implementation.

Practical Application of Safety Management 3 Days

A hands-on course covering SMS implementation skills mapped to Subparts B through E. Participants work through hazard identification, risk analysis, safety assurance design, and safety promotion planning using scenarios relevant to Part 135 operations, including charter, air ambulance, and cargo. Includes Declaration of Compliance preparation as a learning outcome.

Management Systems: Safety Responsibilities 1 Day

Designed for accountable executives, directors of operations, directors of maintenance, and senior leadership. Covers the personal regulatory obligations that Part 5 places on management, the accountability structure required by Subpart B, and the practical behaviors that demonstrate leadership engagement to the FAA.

Just Culture Essentials for Leaders and Managers 1 Day

Building the reporting culture and psychological safety that the FAA considers the foundation of effective SMS. Covers the distinction between honest mistakes, at-risk behavior, and willful negligence, and equips leaders with practical frameworks for responding to safety reports in ways that build trust rather than suppress reporting.

SMS Coaching and Mentoring Consultancy Support

Dedicated Baines Simmons consultant support on an ongoing basis throughout implementation. Available for organizations that need expert guidance through the build phase, help navigating specific regulatory questions, or support preparing for FAA oversight.

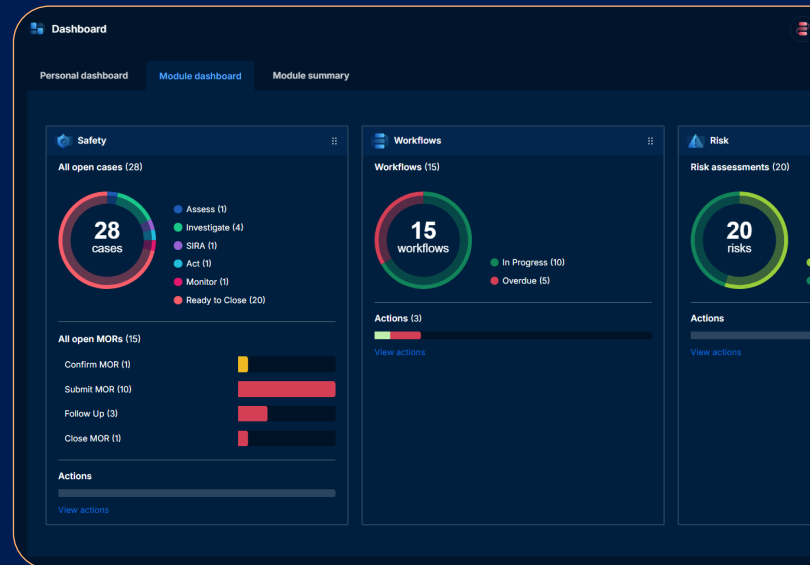
For more information on the available courses, please visit bainessimmons.com/training/courses

TRUSTFLIGHT'S PROVEN SAFETY AND COMPLIANCE PLATFORM



Centrik 5 is TrustFlight's operational platform for safety, quality, and risk management, trusted by operators, MROs, and aviation authorities worldwide.

It is not a generic SaaS tool. It is purpose-built for aviation and configured to each operator's specific operational context.



For Part 5 SMS, Centrik 5 provides the technology backbone across all four components:

- ✓ **Safety Policy and Reporting**
 Confidential hazard reporting with configurable workflows, automated notifications, and full audit trails. Supports the non-punitive reporting culture that the FAA and global research consistently identify as the most critical element of SMS success.
- ✓ **Safety Risk Management**
 Structured SRM workflows for hazard identification, risk analysis, risk assessment, and control design. Risk matrices configured to your operation, not a generic template.
- ✓ **Safety Assurance**
 Audit management, corrective action tracking, safety performance dashboards, and trend analysis. Provides the continuous monitoring and data-driven assessment that Part 5 Subpart D requires, with centralized visibility across all bases.
- ✓ **Safety Promotion**
 Document control, training record management, and safety communication distribution. Ensures training is tracked, competencies are documented, and safety information reaches every employee at every location.

For multi-base operators, Centrik 5 delivers centralized oversight with local accessibility, eliminating the data fragmentation and scattered systems that make spreadsheet-based SMS unsustainable at scale.

One Partner, One Programme

What makes TrustFlight's approach fundamentally different is that the consulting expertise and the technology are designed to work together.

Baines Simmons consultants configure Centrik 5 as part of the build phase, ensuring the platform reflects the processes they have designed for your operation. Training content reinforces how to use the system in practice. Ongoing health checks evaluate both the human and technological dimensions of SMS maturity.

This is not two vendors coordinating through a partnership agreement. It is one integrated capability: trust in your data through Centrik 5, and trust in your people through Baines Simmons.

Conclusion

The May 2027 deadline is not a paperwork exercise.

The FAA has been clear about what it expects: a functioning Safety Management System that is tailored to your operation, embedded in your culture, supported by capable technology, and led by engaged senior management. Generic software and borrowed manuals will not withstand scrutiny.

For Part 135 operators with five or more aircraft, the path forward requires an honest assessment of where you stand, a structured implementation plan, purpose-built technology, and expert training and consulting to build the competence and culture that Part 5 demands.

The operators who begin now will have the time to build an SMS that genuinely improves safety and satisfies the regulator. Those who wait will face a compressed timeline, higher costs, and the risk of building a system that looks compliant on the surface but fails under examination.

TrustFlight delivers the only integrated SMS capability in the market: Baines Simmons' world-class training and consulting, Centrik 5's proven technology platform, and a structured methodology that has been validated across hundreds of aviation organizations worldwide.

Your Next Step

Book a complimentary Part 5 Readiness Briefing with a Baines Simmons consultant.

In 30 minutes, you will receive an honest assessment of where your organization stands and a clear recommendation on the right path forward.

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TrustFlight

TrustFlight is the Aerospace Safety Intelligence Platform, integrating safety and security technology, training and consulting, and crisis management and response into a single connected ecosystem.

Serving more than 1,600 organisations in 120 countries, TrustFlight delivers operational intelligence and the expertise to act on it. The platform combines SaaS workflow automation, AI-driven regulatory intelligence, and 24/7 crisis response to support airports, operators, MROs, OEMs, and regulators. TrustFlight helps aviation organisations close critical gaps between disconnected tools and providers, where risk can accumulate. To learn more, please visit www.trustflight.com.

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