MRO TRACKER

PART 5 SMS · OCTOBER 2026

Ready for May 28, 2027, with records behind every requirement.

How Avistrata runs a Part 5 safety management system for Part 135 and § 91.147 air tour operators, in the same system as your flights and maintenance.

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THE DEADLINE

Two things are due by May 28, 2027

May 28, 2024

Rule in effect

Part 5 now covers every Part 135 operator and § 91.147 air tour operator. New applicants build an SMS during certification.

May 28, 2027

SMS running and declared

A working SMS, and a declaration of compliance signed by the accountable executive and sent to your Flight Standards office (§ 5.9(a)).

Within 24 months

FAA surveillance

Inspectors review all four components, then periodically based on risk.

No implementation plan for Part 135, and no separate approval step: the FAA checks through surveillance. The declaration is a legal statement, so the records must be there first.

THE RULE

Four components, one module

§§ 5.21–5.27

Safety policy

Accountable executive, signed policy, reporting policy, code of ethics, emergency response plan, who accepts each level of risk.

§§ 5.51–5.55

Safety risk management

Hazards from reports, audits, changes and FRATs; risk assessed, controls with owners, acceptance at the right level.

§§ 5.71–5.75

Safety assurance

Audits, SMS evaluations, investigations, confidential reporting, indicators with targets and management reviews.

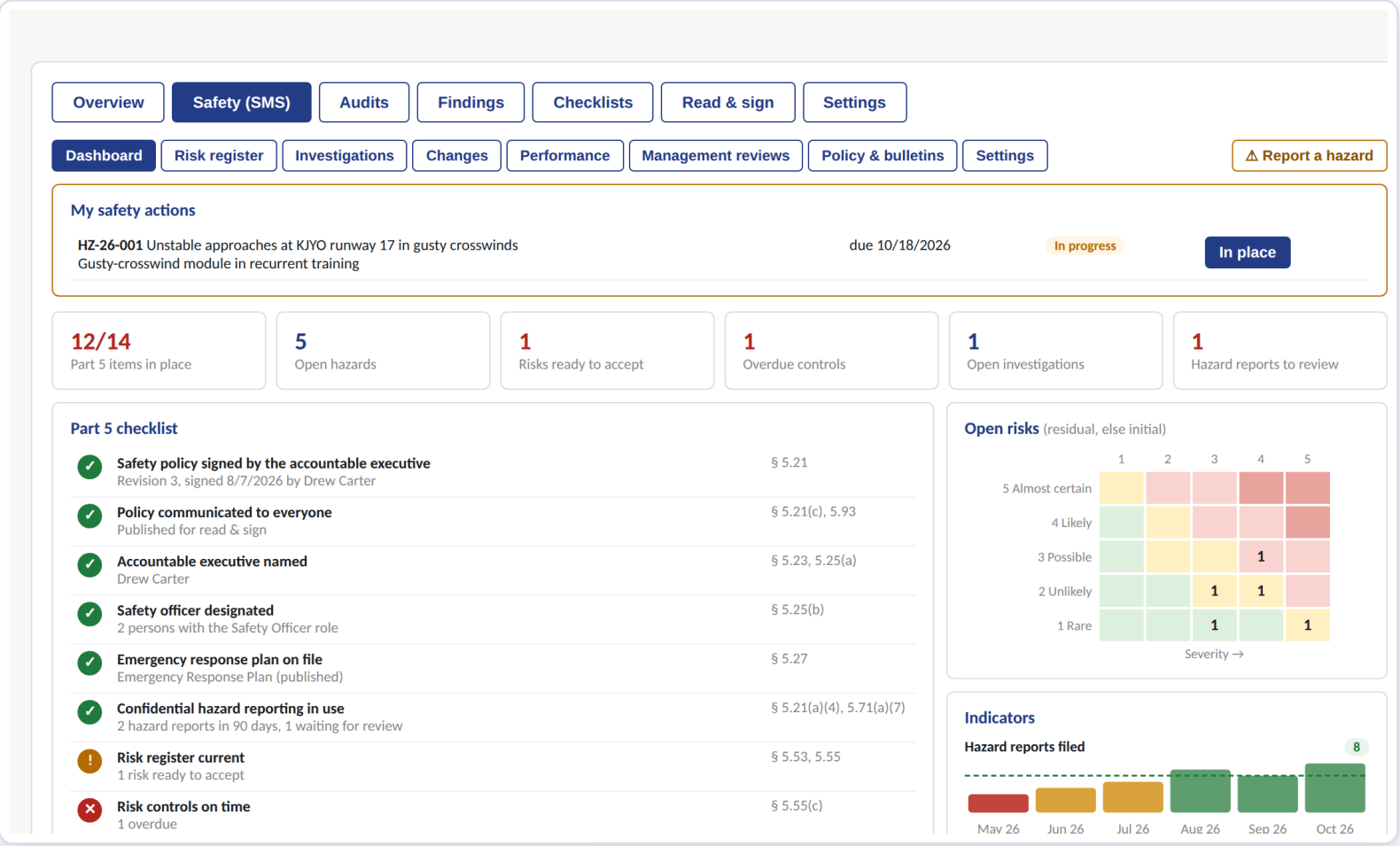
§§ 5.91–5.97

Promotion and records

Training for every SMS role, communication with read-and-acknowledge, and records kept for the required periods.

QUALITY → SAFETY (SMS)

Part 5, requirement by requirement, from your records



1 **Live checklist**

Each Part 5 item shows a green tick, an amber warning or a red cross, computed from the records.

2 **My safety actions**

Controls and reviews assigned to the signed-in person, with due dates.

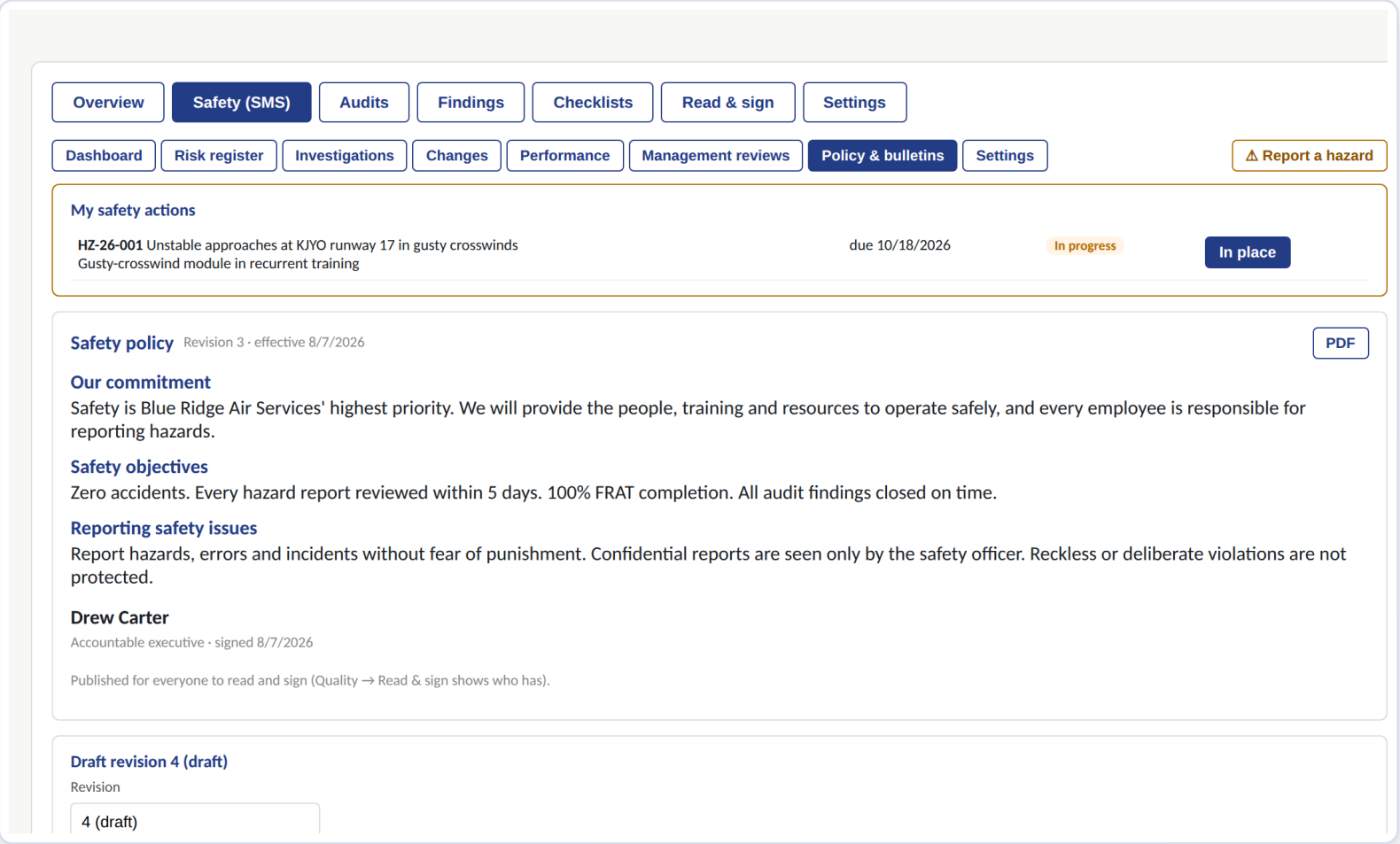
3 **Risk matrix and indicators**

Open risks on the 5×5 matrix and the trend of each safety indicator.

> *"Here's your Part 5 checklist, live."*

COMPONENT 1 · SAFETY POLICY

A signed policy that everyone has read



1

What § 5.21 lists

Objectives, commitment, reporting policy, unacceptable behavior and the code of ethics.

2

Signed and revised

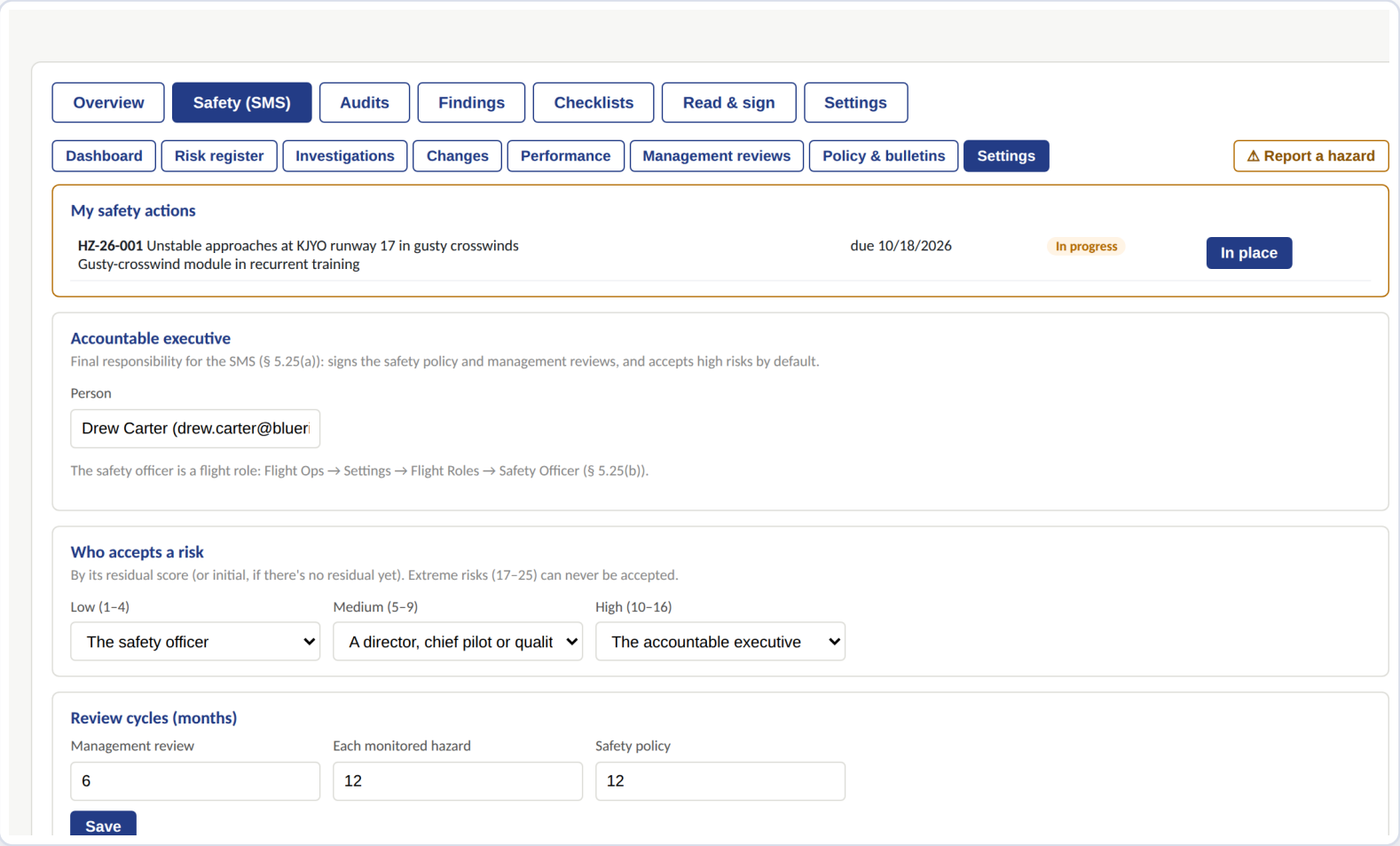
The accountable executive signs each revision; the review comes due every 12 months.

3

Read & sign

Published to everyone, with a record of who has read it (§ 5.93).

Accountability and who may accept risk



1

Accountable executive

Named in Settings; signs the policy and management reviews (§ 5.25).

2

Risk acceptance levels

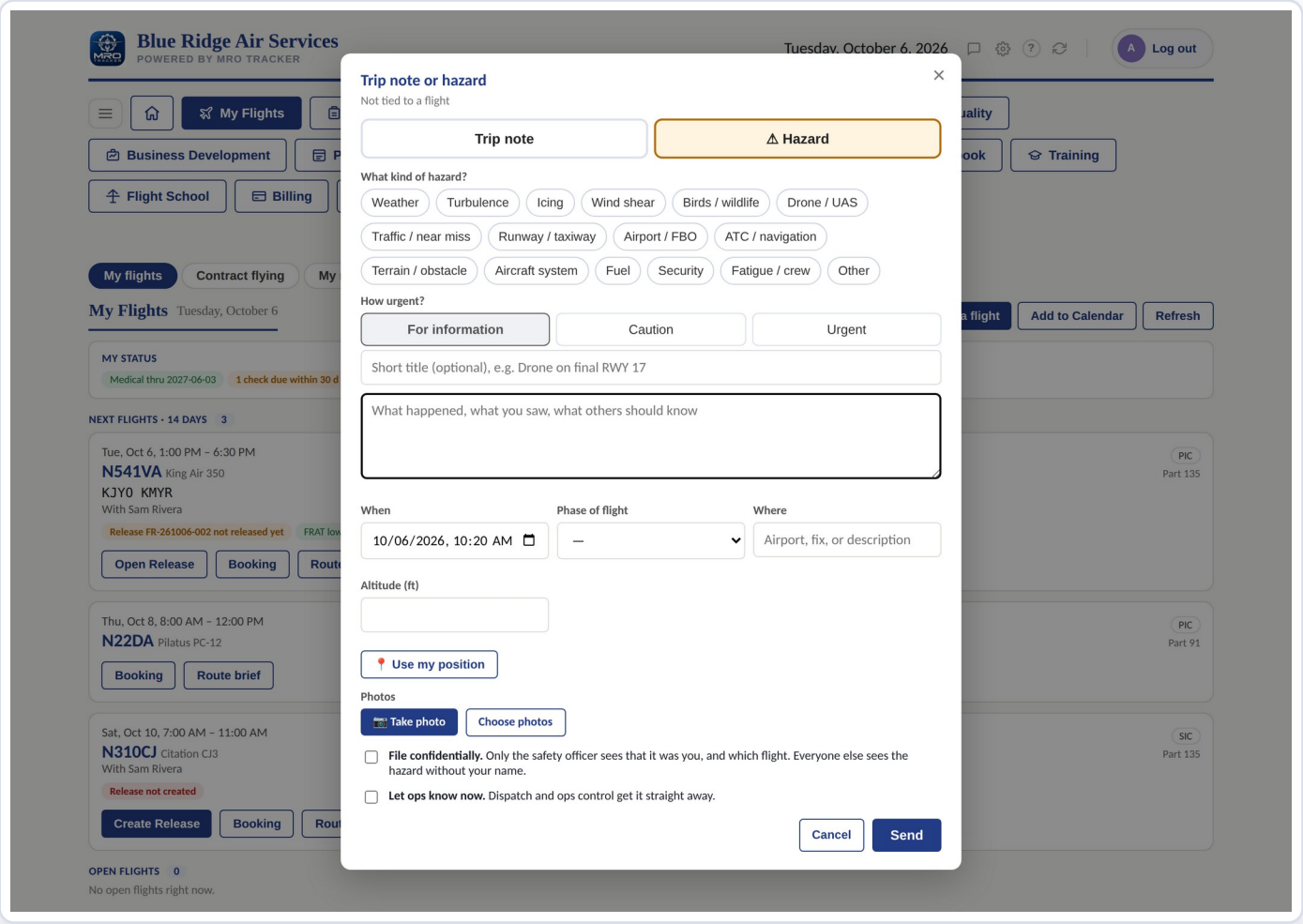
Low, medium and high risk each go to the safety officer, a manager or the accountable executive (§ 5.23).

3

Review cycles

Management reviews, hazard reviews and policy reviews come due on their own.

Hazard reports from the app, confidential if needed



1 **From My Flights**

Any pilot or employee reports a hazard with category, urgency, place and photos.

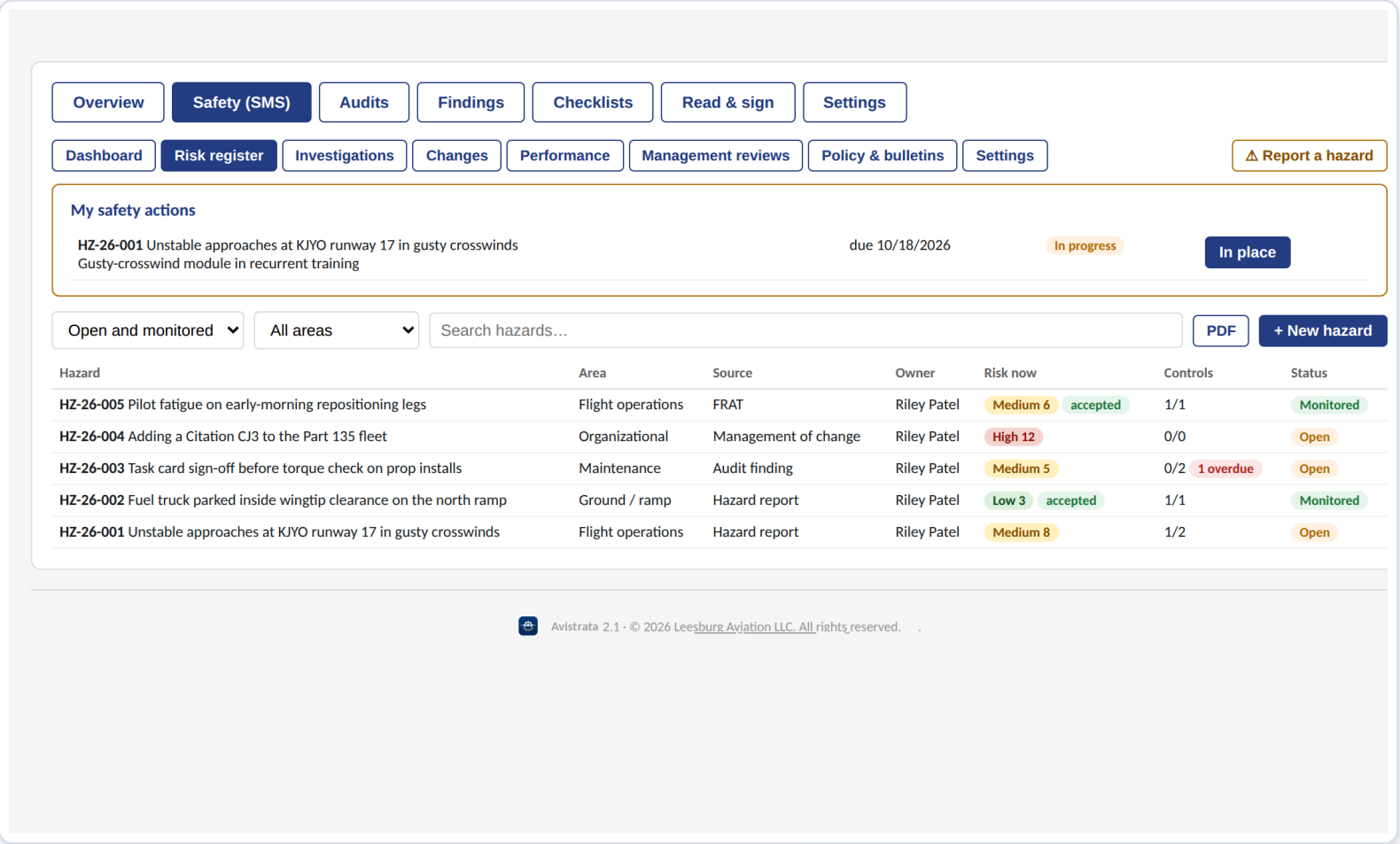
2 **File confidentially**

Only the safety officer sees who filed it and on which flight (§ 5.71(a)(7)).

3 **Into the register**

The safety officer reviews it and turns it into a hazard with an owner.

A risk register with controls and sign-off



1 Hazard to risk

Worst credible outcome, initial and residual likelihood × severity.

2 Controls with owners

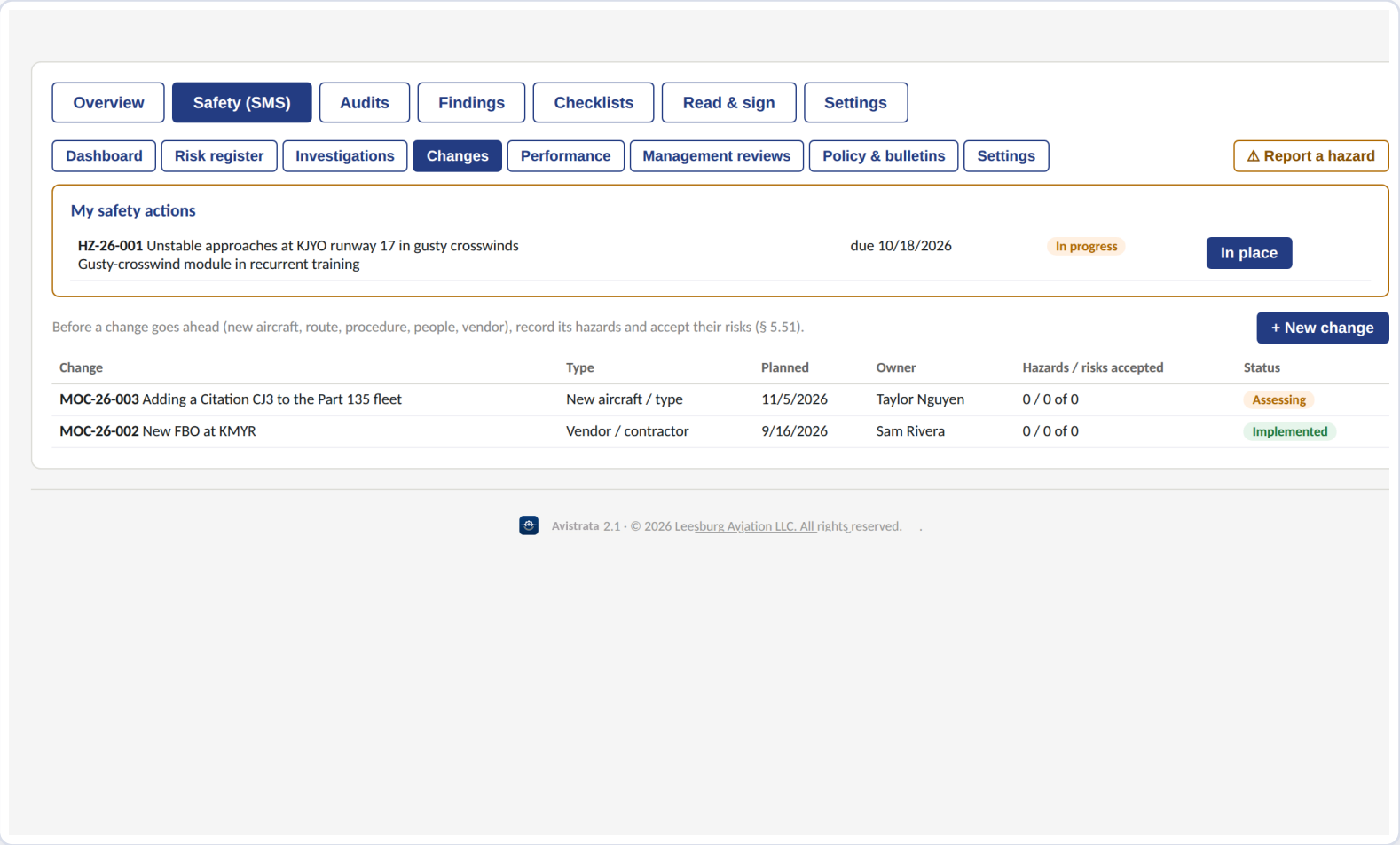
Each control has an owner and a due date; late ones turn the dashboard red.

3 Accepted at the right level

A high risk can only be accepted by the accountable executive (§ 5.55).

> *"Every hazard has an owner, a control and a sign-off."*

Management of change before it goes ahead



1

New aircraft, routes, procedures

Each change is assessed for hazards before it is approved (§ 5.51).

2

FRAT on every release

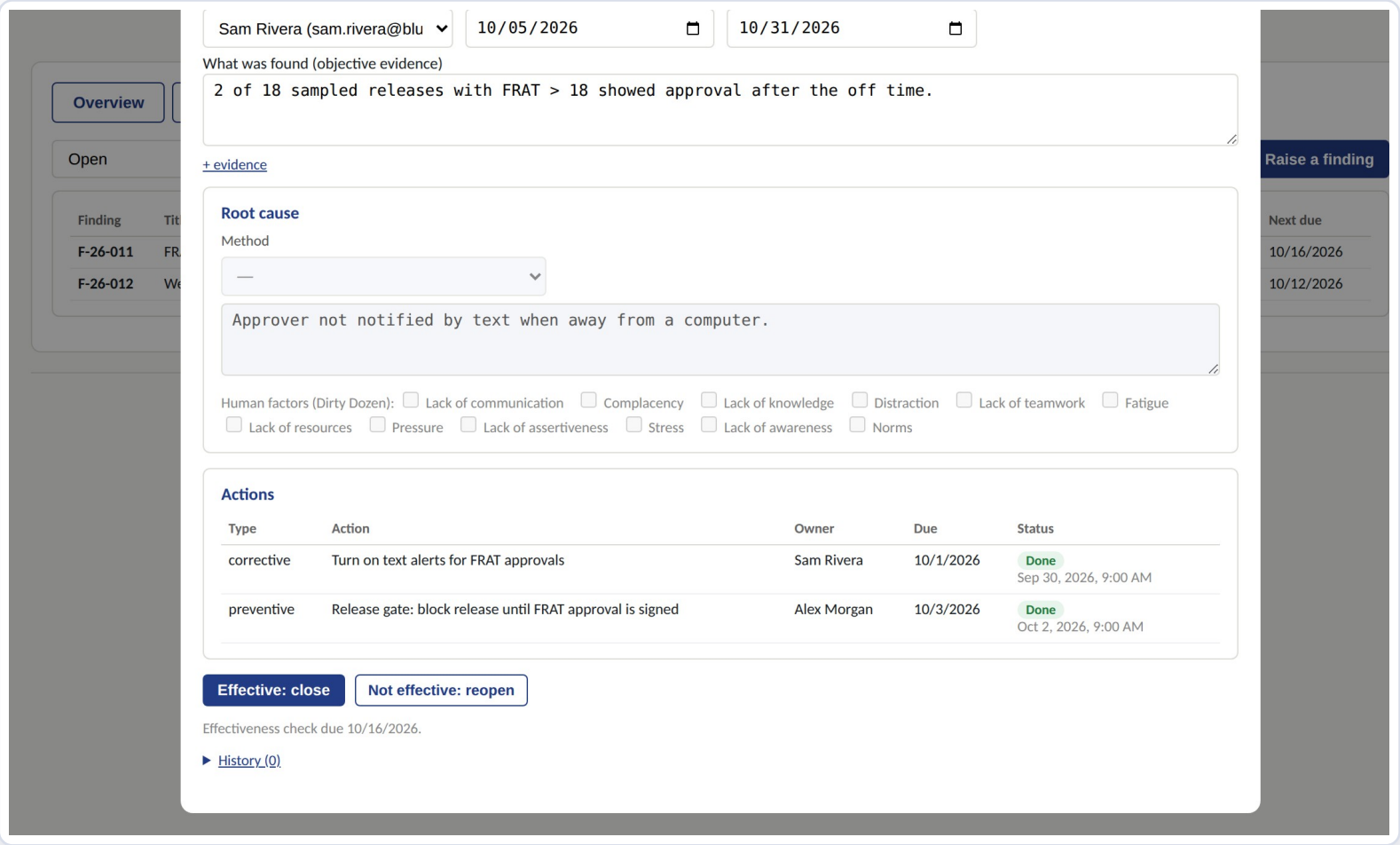
Scores above your line route to the approver; the mitigation stays with the release.

3

One register

Hazards from reports, audits, changes and FRATs all land in the same place.

Audits and findings closed with evidence



1 Your audit programme

Part 5 sets no frequency, so you set it in your SMS; Quality keeps you to it.

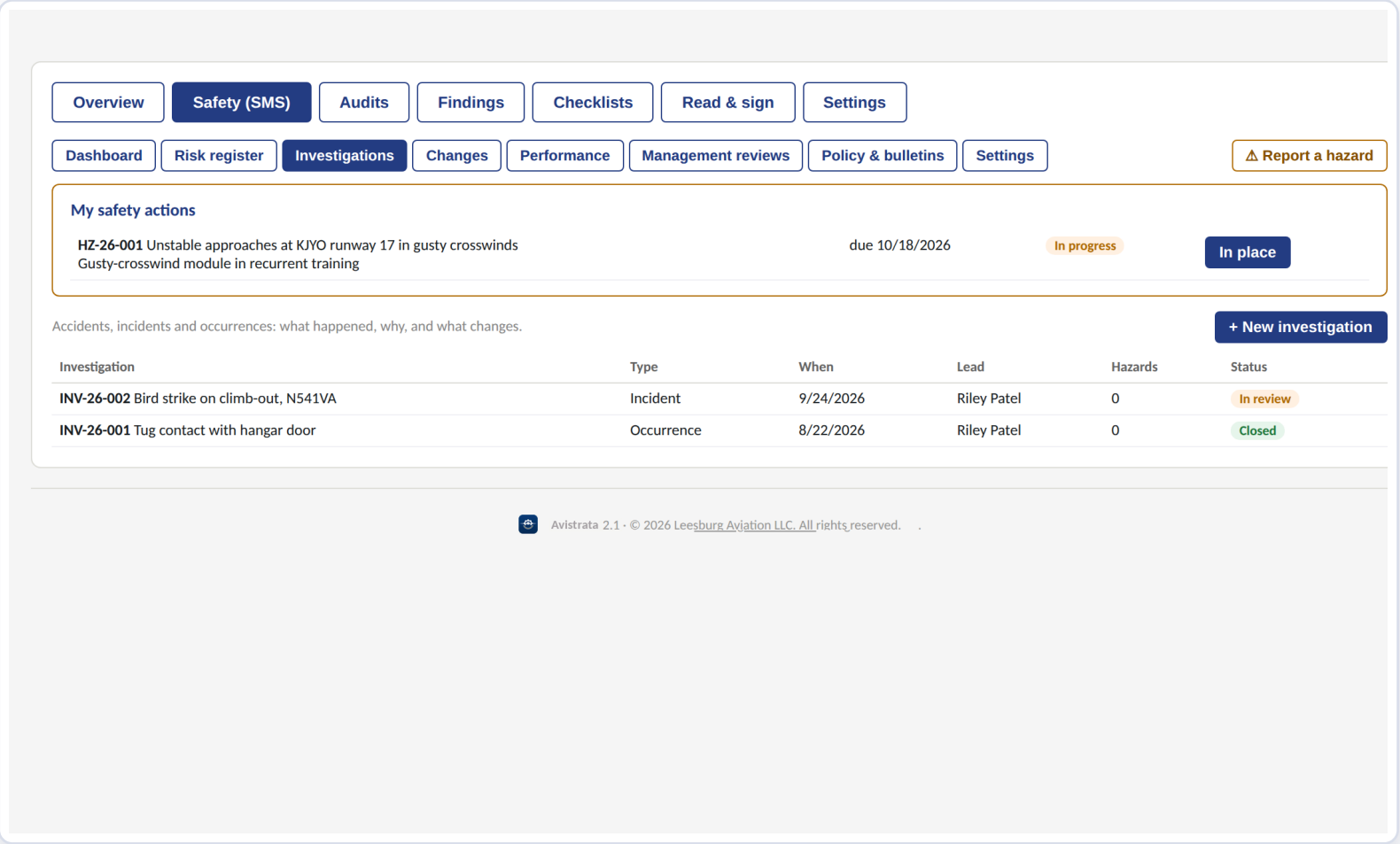
2 Corrective action plans

Root cause, containment, corrective and preventive actions.

3 Effectiveness check

A finding can't close until the fix is verified (§ 5.75).

Investigations that feed the register



1

Accidents, incidents, occurrences

Findings, root cause, contributing factors and recommendations.

2

New hazards from findings

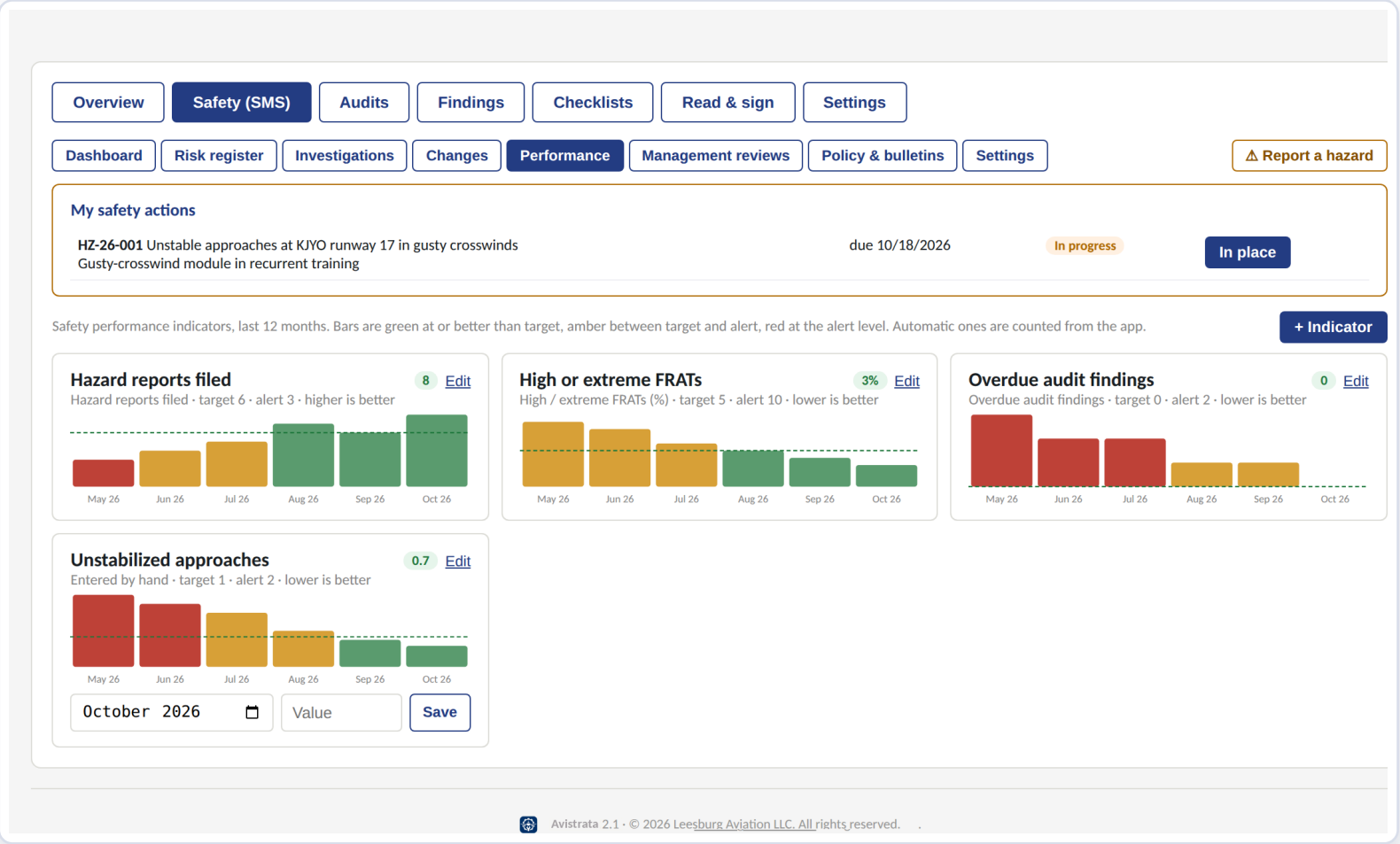
Raised straight into the risk register (§ 5.71(a)(5)–(6)).

3

Kept 5 years

Safety assurance outputs are kept at least five years (§ 5.97).

Safety performance against targets



1 Indicators with targets

Green at or better than target, amber in between, red at the alert level.

2 Counted from your data

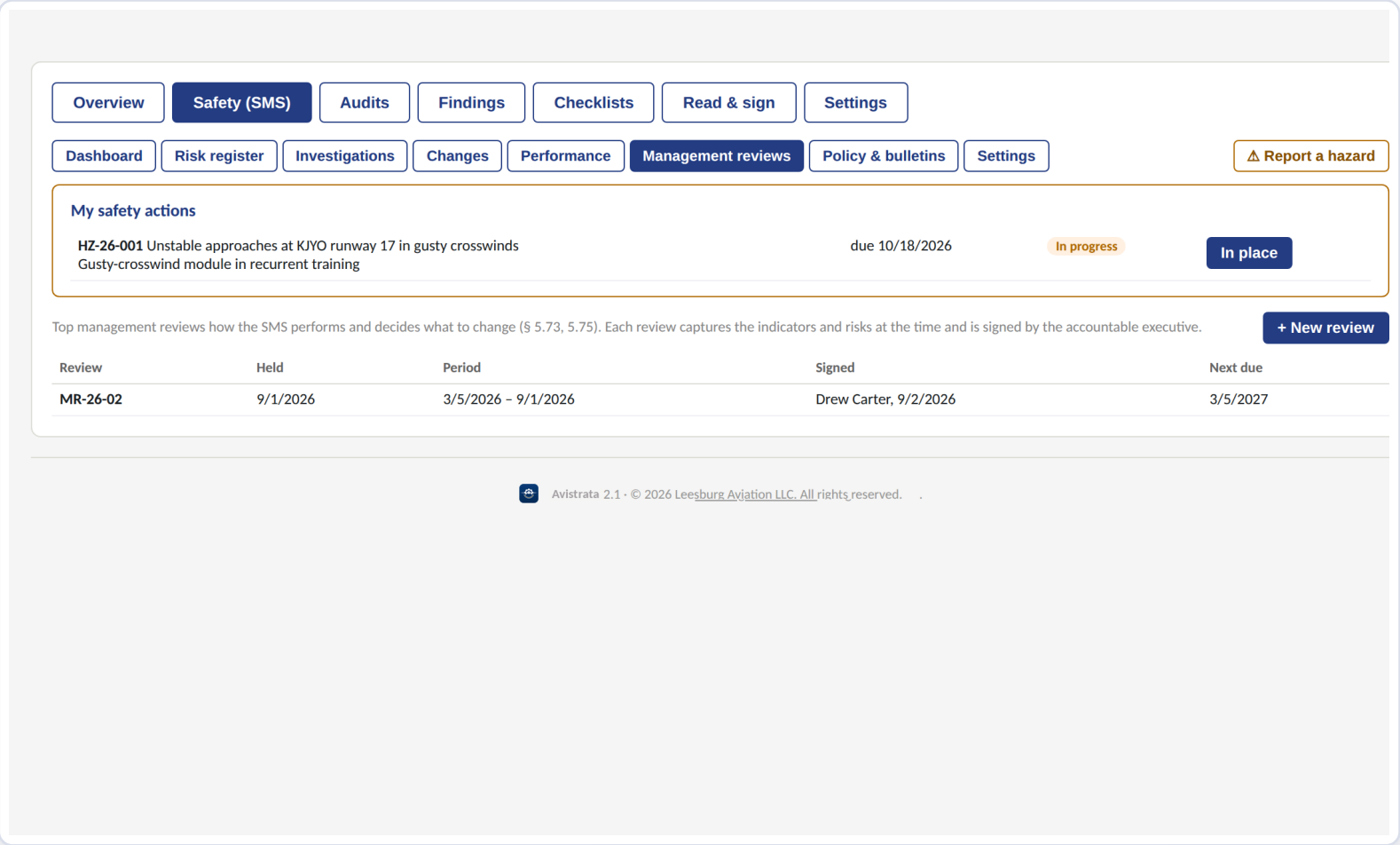
Hazard reports, high-risk FRATs, overdue findings and controls are counted automatically.

3 Your own measures

Add indicators entered by hand, such as unstabilized approaches.

> *"The system tells you when your SMS is slipping."*

Management reviews, signed and scheduled



1

A snapshot in time

Each review captures the indicators and risks at that moment (§ 5.73).

2

Decisions recorded

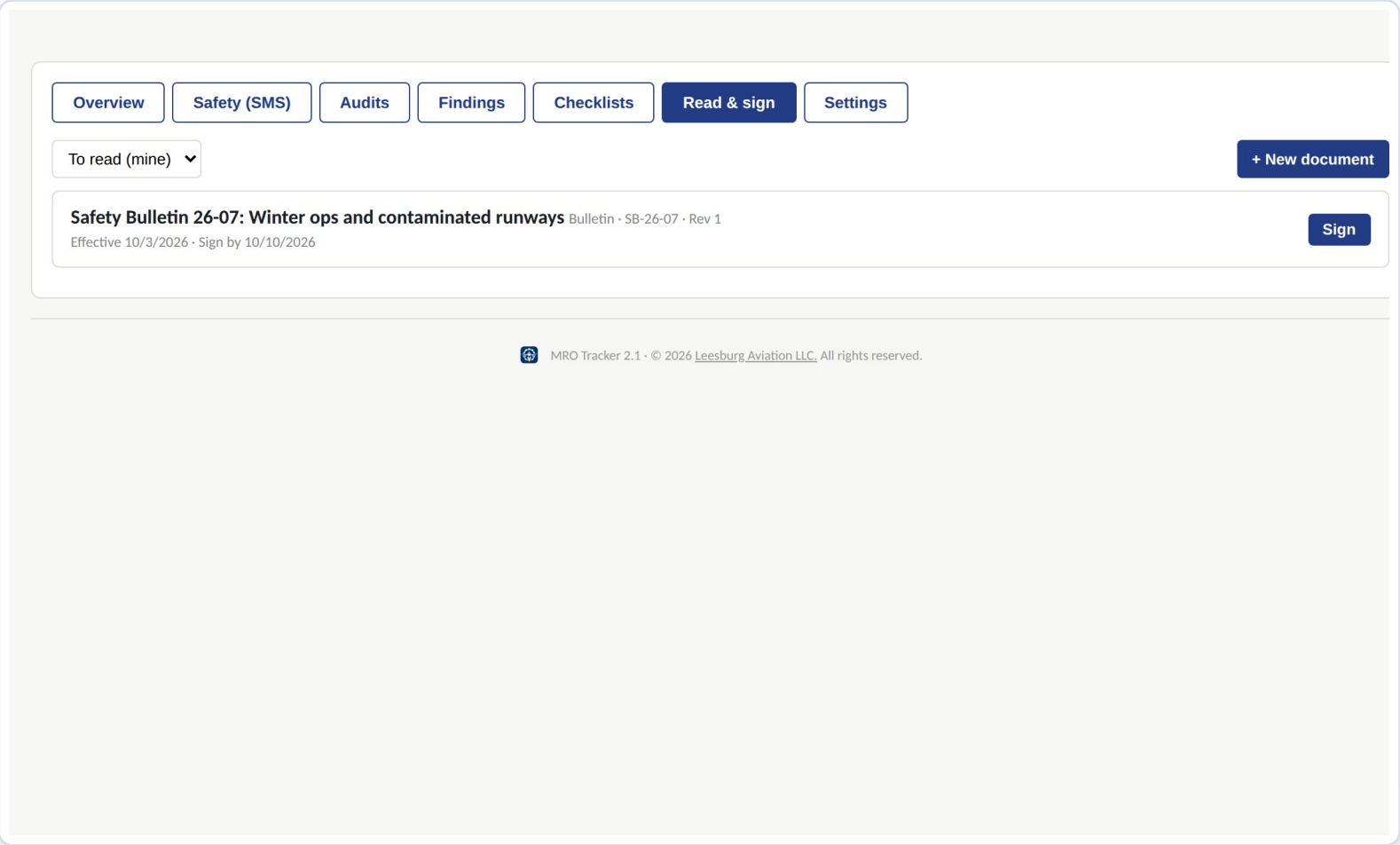
Discussion and decisions, and whether the policy and objectives were reviewed.

3

Next one scheduled

The next review date shows on the dashboard.

Bulletins and procedures acknowledged by everyone



1 **Safety communication**
Share hazards and explain why procedures changed (§ 5.93).

2 **Read & sign**
Each person signs that they read it; you see who hasn't.

3 **Training**
SMS training for every role, tracked per person in Training (§ 5.91).

Records kept as long as Part 5 requires

Signed policies, reviews and investigations can't be deleted, and every change keeps who and when.

Record (§ 5.97)	Keep for	In Avistrata
Safety assurance outputs: audits, evaluations, investigations, reviews	At least 5 years	Quality and Safety (SMS)
Safety risk management outputs	As long as the control is relevant	Risk register and changes
Training records (§ 5.91)	As long as the person is employed	Training
Safety communications (§ 5.93)	At least 24 months	Read & sign

Signatures follow the FAA's AC 120-78B: own login, locked once signed, full history. Required Part 135 records are accepted through OpSpec A025.

A PATH TO THE DEADLINE

From today to a signed declaration

This month

Policy

Name the accountable executive and safety officer; sign and publish the policy and ERP.

Next 60 days

Risk management

Open hazard reporting, build the risk register, FRAT on every release.

Next 90 days

Assurance

First internal audit, three indicators with targets, first management review.

Spring 2027

Declare

Check every requirement has records, then sign and send the declaration.

This deck summarizes Part 5 and FAA guidance as of October 2026. It is not legal advice; confirm with your principal inspector.

MRO TRACKER

NEXT STEPS

Let's get you to May 2027 with evidence.

14-day trial

Your policy and first hazards loaded, with a setup call for your safety officer.

Free Part 5 brief

mrotracker.com/part-5-sms: requirements, records and e-signatures.

Full product tour

Maintenance and dispatch for the rest of your team.

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