

14 CFR PART 5 — SAFETY MANAGEMENT SYSTEM

Part 5 compliance, evidenced.

A clause-by-clause view of how SAFEJETS MS covers the FAA Safety Management System requirement — and how we help operators build the system behind it.

IMPLEMENTATION DEADLINE

28 May 2027

Part 135 certificate holders and 91.147 air tour operators

THE COMPLIANCE CLOCK

Nine months, and the window does not reopen

Part 5 sets fixed implementation dates by certificate type. For most operators still building, the remaining runway is measured in months — and the requirement is a working system, not a submitted manual.

36

months granted from the 2024 rule

~9

months left as of Sept 2026

Part 135 **Certificated before 28 May 2024**

SMS implemented and a declaration of compliance filed by 28 May 2027. Applications made on or after that date: SMS required at certification.

91.147 **Air tour operators with an LOA**

LOA applied for on or before 28 May 2024: 28 May 2027. Applications made on or after that date must meet § 91.147(b) at the time of application.

Part 121 **The window has closed**

Certificate holders certificated before 28 May 2024 had 12 months for the Part 5 amendments — that date was 28 May 2025.

SMSVP **Voluntary, and now wider**

Open to Part 91K, LHFE, and Parts 125, 133, 137, 141, 142, 145 and 147. Every organization files a declaration of compliance.

The standard **Documented is not the same as implemented**

A manual on a shelf does not meet the rule. The four components have to be in operation by the deadline: a signed and communicated policy, a working risk management process, assurance data being collected and analysed, and training and communication that leave records behind them.

The manual is never the bottleneck. Reporting culture, assurance data and evidence of communication are — and none of them can be produced retroactively.

THE DELIVERABLE ON 28 MAY 2027

A signed declaration — and nobody checks your work first

FAQ Q15 What is actually submitted

A declaration of compliance: a legal document stating you have developed and implemented an SMS meeting Part 5. Organization name, certificate number, physical address.

FAQ Q15 Who signs it

The accountable executive, or another senior member of management. The signature is personal, and it is given against a rule they have probably never read.

FAQ Q14 The FAA will not review it first

No inspector validates your SMS before you implement it. You self-validate, you declare, and the FAA takes you at your word.

FAQ Q13 When you first hear from them

The first contact may be your CMT requesting your SMS processes and procedures ahead of surveillance. Not a warning — a request you either can or cannot answer.

After filing Validation happens in surveillance

The declaration updates your vitals in SAS and adds SMS questions to your oversight data collection tools. The check comes after the signature, never before it.

5.9(e) Whether all of it applies to you

Single-pilot 135 and 91.147 operators with multiple employees meet every applicable requirement. Where the single pilot is the sole individual responsible, the excepted sections apply.

The accountable executive signs first and is audited afterwards. That is the case for evidence over intent — and it is the FAA's, not ours.

WHAT COMPLIANCE ACTUALLY LOOKS LIKE

Part 5 is assessed on evidence, not intent

Every subpart ends in a record somebody has to produce on request. These four questions are where paper-based systems fail — and they are the questions SAFEJETS MS was built to answer.

→ **You issued the safety policy. Who read it?**

5.21(c) requires the policy to be documented and communicated throughout the organization. A distribution list is not evidence of receipt.

→ **You accepted a risk. At what residual level?**

5.55(d) requires the evaluation to happen before the control is implemented. The assessment has to be dated earlier than the decision.

→ **You found a deficiency. How was it closed?**

5.75 requires processes to correct what assessment finds. Closure without a documented cause is an open finding waiting to recur.

→ **Training was required. Who completed it?**

5.91 and 5.97(c) require competency records for every individual named under 5.23, retained for as long as they are employed.

If the answer lives in an inbox, a shared drive and somebody's memory, it is not an answer an auditor can accept.

THE PLATFORM

A single system of record for safety, quality and compliance

SAFEJETS MS is a web-based compliance and safety management system, in service since 2022 and built for aviation from the first line of code — not a generic QHSE tool with an aviation label.

22

organizations on
SAFEJETS MS

50+

clients across the
SAFEJETS suite

V4

current release,
live 2026

Safety management

Hazard, occurrence, near-miss and incident reporting. Bowtie risk assessment. SPI/SPT tracking with three alert levels. Emergency response.

Compliance monitoring

Audit planning, checklist management and performance tracking, with controlled external access for auditors and interfacing parties.

Documents and training

Controlled documents with mandatory reading and acknowledgment. Training assigned by role, completion recorded per person.

AI assistance

A fine-tuned assistant drafts risk analyses, CPA root causes and change assessments. AI drafts; competent humans decide and sign.

Fatigue risk management

Fatigue reporting and fatigue risk analysis as a distinct channel. Crews report fatigue without it being filed as a generic hazard, and the data supports duty and scheduling decisions with evidence.

Flight risk assessment tool

A FRAT built to your own criteria and thresholds rather than a fixed template — pre-flight risk scored against the factors that actually drive risk in your operation, with the completed assessment retained.

One login, one permission model, one audit trail — and a mobile app, so a hazard can be reported from the ramp rather than remembered until Monday.

PART 5 MAPPING · SUBPART B

Safety policy, accountability and emergency response

5.21(a) Policy content

Objectives, resource commitment, reporting policy, unacceptable behavior, ERP and code of ethics held as revision-tracked controlled content.

5.21(b) Accountable executive signature

Sign-off recorded against the specific document revision, so the approved version and the signature cannot drift apart.

5.21(c) Documented and communicated

Controlled Documents tracks mandatory reading and acknowledgment per person; the notification log records read receipts and the date.

5.21(d) Regular review

Scheduled review cycles with reminders, so the accountable executive's review is a dated event rather than an assertion.

5.23 · 5.25 Accountability and authority

Roles and group policies map accountability to named individuals. Monthly performance reports form the 5.25(c)(5) reporting line to the AE.

5.27 Emergency response planning

ERP module covering delegated authority, assigned responsibilities and coordination with airports, contractors and affiliates.

Subpart B is where most gap analyses look complete on paper and fail on evidence — the requirement is a communicated policy, not a written one.

PART 5 MAPPING · SUBPART C

Safety risk management

5.51 When SRM must be applied

Change analysis covers new systems, revisions to existing systems, new operational procedures, and hazards surfaced by safety assurance.

5.53 System analysis and hazard identification

The hazard register sits inside system analysis: function, operating environment, procedures, resources and interfaces captured per entry.

5.55(a)–(b) Risk analysis and assessment

Bowtie assessment with threats, consequences and barriers, multi-user access, and a defined threshold for acceptable safety risk.

5.55(c) Developing risk controls

Controls become assigned mitigation tasks with an owner and a due date, so a control that was never implemented is visible.

5.55(d) Evaluation before implementation

Residual risk is evaluated and recorded before a control is accepted — the sequence Part 5 requires, enforced by the workflow.

5.57 Hazards outside your own system

Shared pages and external-party access let you notify an interfacing organization and retain proof the notification was sent and seen.

The AI assistant proposes threats, consequences, barriers and three-level risk for a proposed change — a first draft in minutes, reviewed and owned by your safety staff.

PART 5 MAPPING · SUBPART D

Safety assurance

5.71(a)(1)–(4) Monitoring, auditing and evaluation

Compliance monitoring with audit planning, checklists and performance tracking; controlled external access for auditors.

5.71(a)(5) Investigation of incidents and accidents

Investigation module with human error evaluation using a culpability and decision tree method, not a free-text narrative.

5.71(a)(7) Confidential employee reporting

Confidential and anonymous reporting from web or mobile, with optional follow-up contact — the channel crews actually judge you on.

5.71(a)(6) · (8) Non-compliance and external hazards

Regulatory non-compliance reports and externally received hazard notifications enter the same register, so they are analysed together.

5.71(b) · 5.73 Data analysis and performance assessment

SPI/SPT with three alert levels and monthly performance reports; the meeting module holds the safety review record for the AE's assessment.

5.75 Continuous improvement

CPA request and management with root cause analysis in your own method — Fishbone, 5 Why — so deficiencies close against a stated cause.

Assurance is the subpart that needs operating history. Every month spent without a reporting system is a month of data you cannot go back and collect.

PART 5 MAPPING · SUBPARTS E AND F

Safety promotion, documentation and recordkeeping

5.91 Competencies and training

Training module assigns by role and target group, tracks per-competency completion, issues certificates and warns on expiry.

5.93 Safety communication

Custom notification types, read-receipt tracking, a feedback channel and a daily log — covering awareness, hazards and why changes were made.

5.95 SMS documentation

Document library and DocuShare hold the safety policy and SMS processes as controlled, revision-tracked documents with 24-hour backup.

5.97(a) Safety risk management records

Outputs retained for as long as the control remains relevant to the operation, linked to the hazard and control they came from.

5.97(b) Safety assurance records

Audit, evaluation, investigation and monitoring outputs retained for the minimum five years, searchable rather than archived.

5.97(c) · (d) Training, communication and hazard-sharing records

Training records for the duration of employment. Communications under 5.93 — and hazard information shared under 5.57 — for at least 24 consecutive calendar months.

Four different retention rules, four different clocks. Configured once in the system, they stop being something anyone has to remember.

YOUR GAP ANALYSIS, IN THE SYSTEM

The FAA gap analysis tool as a live checklist

The FAA publishes a Part 5 SMS Implementation Gap Analysis Tool: every requirement in one column, and a Location & Reference column you are expected to fill. We load it into Compliance Monitoring as a working checklist.

As a spreadsheet

One person owns the file. The Location & Reference column is typed by hand and goes stale the first time a manual is revised. Open items have no owner and no date. Nobody can tell whether a blank row is unmet or just unfilled.

As a checklist in SAFEJETS MS

Each requirement links to the document, process or record that satisfies it. References update when the document is revised. Open items become assigned tasks with owners and due dates. Progress is a live figure, not a status meeting.

Also available ICAO-based safety gap analysis, shipped with the platform

Operators working to both ICAO Annex 19 and Part 5 can run the two side by side rather than maintaining separate evidence sets. Checklists are configurable, so a state-specific or customer-specific audit standard can be added the same way — and the same closure tracking applies to findings raised by your own auditors, by a customer audit, or by the FAA.

Bring your own gap analysis to the first call. We will show you, requirement by requirement, where the evidence would live.

IMPLEMENTATION SUPPORT

Most operators do not need a licence. They need a system built.

We are aviators before we are a software vendor. Where an operator wants help rather than a login, the same team that built the platform does the implementation work.

2013

in aviation since

13 yrsoperations, safety and
compliance**01 Gap analysis**

Run against Part 5 with your postholders in the room, not delivered as a report you then have to interpret.

02 Documentation build

SMS manual, procedures, emergency response plan, risk methodology and an SPI/SPT set that suits your operation.

03 Configuration

FRAT criteria, risk matrix, audit checklists, notification rules and retention periods set to your certificate and fleet.

04 Training

Accountable executive, safety manager, compliance monitoring manager and postholders — on the regulation and on the system.

05 Ongoing advisory support

Implementation is where most SMS programmes stall. We stay engaged through the first assurance cycles — the first audits, the first SPI reviews, the first management review with the accountable executive.

Regulatory grounding

Thirteen years working under EASA-aligned regulatory frameworks and ICAO Annex 19, with AOC holders and MROs. The four components are the same everywhere; only the reference and the inspector change.

Aviation training is delivered under AVIACOURSE, ENTROPOL's registered training brand — and advisory support continues into your first assurance cycles.

THE TEAM BEHIND THE SYSTEM

Aviation safety, AI and system engineering under one roof

SAFEJETS MS is built by ENTROPOL R&D. The core team combines aviation safety, management science, artificial intelligence and full-stack engineering — which is why the product connects regulation, workflow and analysis rather than just storing forms.

Aviation-native

Aeronautical engineering, a doctorate in management and organization, and safety practice — the domain came first, the software second.

AI and data science

A dedicated AI engineering lead. The assistant is a fine-tuned model for aviation safety work, not a general chatbot wrapper.

Management systems

Consultancy experience with ISO 27001 information security and ISO 42001 artificial intelligence management systems — so governance questions from your IT function are answered by people who have implemented the standards.

Product family

SAFEJETS MS, FTL and STOCK cover compliance, flight operations and maintenance inventory under one partner, on one login. Operators can start with MS alone and add the rest later.

International partnerships

Working alongside Traxxall, JSSI, MySky and PNRGO across the operator and maintenance ecosystem, with integrations to schedulers, accounting systems and ERPs via OAuth.

Hosting

Hosted in the United States on cloud infrastructure, with 24-hour backup. Data residency is not a special arrangement.

AI drafts. Humans decide. Every output is reviewed by competent safety staff before it enters your official records.

FROM CONTRACT TO OPERATING SYSTEM

Four weeks to running, one to two months to tailored

We open the account promptly and train your administrators first, so the system is in real use while customization is still being scoped.

01 Setup

Account opened, structure created, initial training for administrators and postholders.

02 Familiarization

Your team works in the system with continuous contact from ours. Questions answered while they are still cheap.

03 Customization

Your requests received and discussed — report types, checklists, FRAT criteria, workflow specifics.

04 Implementation

Customization delivered and released. Typically complete within one to two months of contract.

Week 1 and Week 2

Setup and familiarization. Administrators and postholders are trained first, so the people who will run the system are competent in it before crews are onboarded. The reporting channel can be open inside the first fortnight — which is when assurance data starts accumulating.

Weeks 3 to 4, then delivery

Customization scoped over two weeks and implemented after. Nothing in this sequence requires your Part 5 documentation to be finished first — the system can run while the manual is still being written, and the two converge.

Starting now leaves margin for FAA interaction before 28 May 2027. Starting in 2027 does not.

NEXT STEP

Name the requirement.

We will show you where the evidence lives.

Thirty minutes, held against your own gap analysis rather than a scripted demo. If your safety manager would rather read first, we will send the clause-by-clause mapping as a document.

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