Station #2: Safety Documentation & Recordkeeping Guidance

Concise examples of documentation and records that support the four pillars of a Safety Management System (SMS). Written for operators conducting rotorcraft external-load (Part 133), agricultural aircraft (Part 137), and commuter/on-demand (Part 135) operations. Tailor to your OpSpecs/LOAs, aircraft types, and operational control model. Key recordkeeping anchors (selected):

- 14 CFR 5.95: Maintain SMS documentation (safety policy; SMS processes/procedures).
- 14 CFR 5.97: Retain SRM outputs while controls remain relevant; retain SA outputs 5 years; retain SMS training records while employed; retain SMS communications 24 months.
- 14 CFR 5.9: Part 5 SMS applicability and compliance timelines for Part 135 certificate holders.
- Operational records to integrate into document/records control: Part 135.63 (pilot records, load manifests), Part 137.71 (job/dispensing records), Part 133 (certificate availability and Rotorcraft-Load Combination Flight Manual control).

Compliance note: Coordinate formats and retention with your FAA POI/PAI and company policy (including PRD requirements).

1. Safety Policy

Documents leadership commitment, defines accountability, and establishes controlled processes for how safety work is done and documented.

Table 6: Example List of Safety Policy Records / Artifacts

Example record / artifact	Definition	133 / 137 / 135 linkage	Why it matters (Part 5)
Controlled SMS Manual / Safety Policy Statement (revision log)	Controlled doc describing SMS scope, policy, objectives, roles, and interfaces.	Cross-references OpSpecs/LOAs, Part 133 RLCFM, Part 137 procedures, and Part 135 GOM/ops control.	Meets Part 5.95 expectations and prevents outdated procedures from driving high-risk ops.
Accountability and Authority Records (AE acceptance, committee charter)	Evidence of who is accountable, who can accept risk, and how decisions escalate.	Clarifies approvals for high-risk external loads, chemical/material changes, and Part 135 operational control decisions.	Supports consistent risk acceptance and defendable decisions during FAA oversight and internal reviews.
Document and Records Control Procedure + Master Index	How docs/records are created, approved, distributed, revised, archived, and protected.	Integrates required records (135.63, 137.71) and controls Part 133 certificate/RLCFM availability.	Reliable records are SMS evidence. Good control supports Part 5.97 retention and organizational learning.

2. Safety Risk Management (SRM)

Documented process to identify hazards, assess risk, define controls, and formally accept residual risk for specific operations and changes.

Table 7: Example List of Safety Risk Management Records / Artifacts

Example record / artifact	Definition	133 / 137 / 135 linkage	Why it matters (Part 5)
Hazard Register / Risk Control Register	Log of hazards, assessed risk, controls, owners, and links to supporting evidence.	Includes Part 133 load/hook hazards, Part 137 drift/chemical hazards, Part 135 weather/IFR/pax hazards.	Part 5.97: retain SRM outputs while controls remain relevant; supports consistent, repeatable SRM.
Mission / Job Safety Analysis (JSA) and Pre-Flight Risk Assessment	Point-of-work forms capturing hazards, mitigations, and go/no-go decisions.	Tailor to external-load plans, ag mix/load and wind limits, and Part 135 legs (alternates, duty/rest, terrain/night).	Shows controls were applied where risk is highest; enables trending and targeted mitigations.

Example record / artifact	Definition	133 / 137 / 135 linkage	Why it matters (Part 5)
Management of Change (MOC) Package (screening + SRM + approvals)	Pre-implementation evaluation for changes (aircraft, routes, bases, equipment, vendors, procedures).	Triggers: new load class/mission type, new chemical/material, new Part 135 schedule/customer profile or dispatch tool.	Preserves rationale for controls and sets up later verification under Safety Assurance.

3. Safety Assurance

Evidence that controls are working, using audits, surveillance, data trending, and corrective actions to maintain and improve performance.

Table 8: Example List of Safety Assurance Records / Artifacts

Example record / artifact	Definition	133 / 137 / 135 linkage	Why it matters (Part 5)
Audit / Surveillance Program Records (plan, checklists, findings)	Internal evaluations verifying compliance and effectiveness (what, who, when, results).	Targeted checks for Part 133 rigging/briefings, Part 137 chemical handling/job logs, Part 135 records integration (pilot/training/load manifest).	Part 5.97: retain SA outputs at least 5 years; audits detect drift before it becomes an accident.
Safety Performance Monitoring (SPM) Logs / Dashboards	Records of SPIs, trends, analysis, and decisions (rates, exceedances, repeat hazards).	Example metrics: load events per hour, spray deviations per job, unstable approaches per 100 legs, maintenance write-up trends.	Turns records into actionable safety intelligence and demonstrates SMS effectiveness.
Corrective Action Plan (CAP) Tracker + Effectiveness Reviews	Closed-loop record linking events to root cause, actions, evidence, verification, closure.	CAPs often update procedures, training, and operational control across 133/137/135.	Proves hazards are addressed sustainably, supports inspections, and prevents recurrence.

4. Safety Promotion

Ensures personnel are competent, informed, and engaged through training, communication, and lessons-learned sharing.

Table 9: Example List of Safety Promotion Records / Artifacts

Example record / artifact	Definition	133 / 137 / 135 linkage	Why it matters (Part 5)
Training Matrix + Individual Training Records (SMS and ops-specific)	Role-based training requirements plus individual completion/currency records.	Integrate Part 133 external-load procedures, Part 137 knowledge/skills, and Part 135 training/checks and duty compliance.	Part 5.97(c): retain SMS training records while employed; supports standardization and defensibility.
Safety Communications Archive (bulletins, alerts, read-and-sign logs)	Retained communications plus distribution/receipt evidence (slides, memos, acknowledgments).	Seasonal campaigns (ag peak), external-load alerts, and Part 135 passenger/IFR risk reminders.	Part 5.97(d): retain communications at least 24 months; proves workforce was informed of hazards/controls.
Debrief / Lessons-Learned Records (post-mission, periodic reviews)	Structured capture of what changed, what was risky, and improvement actions.	Use for complex lifts, repeated spray jobs, and Part 135 customer/route patterns; link to hazard register and CAPs.	Accelerates learning and closes the loop from events to improved procedures and training.