

**Safety Attribute Inspection (SAI) Data Collection Tool**  
**7.1.3 Director of Safety (OP)**

**ELEMENT SUMMARY INFORMATION**

**Purpose of this Element** (certificate holder's responsibility):

- To provide a qualified individual with direct access to senior management to ensure the overall safety of the certificate holder's operations through the effective application of its safety program.

**Objective** (FAA oversight):

- To determine if the certificate holder's Director of Safety (or equivalent) position meets all applicable requirements of Title 14 of the Code of Federal Regulations (14 CFR) and FAA policies.
- To determine if the certificate holder's Director of Safety (or equivalent) position incorporates the safety attributes.
- To identify any shortfalls in the certificate holder's Director of Safety (or equivalent) position.

**Specific Instructions:**

- For information regarding the use of fewer, combined, or different categories of management positions, refer to FAA Order 8900.1, Volume 3, Chapter 18, Section 3.

**SUPPLEMENTAL INFORMATION**

**Specific Regulatory Requirements (SRRs):**

- SRRs:
  - 119.43(b)
  - 119.43(b)(1)
  - 119.43(b)(2)
  - 119.43(c)
  - 119.65(a)(1)
  - 119.65(b)
  - 119.65(c)
  - 119.65(d)(1)
  - 119.65(d)(2)
  - 119.65(d)(2)(i)
  - 119.65(d)(2)(ii)
  - 119.65(d)(2)(iii)
  - 119.65(d)(2)(iv)
  - 119.65(d)(2)(v)
  - 119.65(d)(3)
  - 119.65(e)(1)
  - 119.65(e)(2)
  - 119.65(e)(3)
  - 121.135(a)(1)
  - 121.135(b)(1)
  - 121.135(b)(3)
  - A.006

**Related CFRs & FAA Policy/Guidance:**

- Related CFRs:  
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- FAA Policy/Guidance:  
Intentionally left blank

### SAI Section 1 - Procedures Attribute

**Objective:** Procedures, instructions, and information are documented methods for accomplishing a process. The certificate holder's policies should establish their compliance posture. Policies may be stand-alone statements, or they may be imbedded within procedures, instructions, or information regarding a particular regulatory requirement. The questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder has documented or prescribed methods of accomplishing the process requirements that provide answers to the associated questions regarding who, what, when, where, and how. This section contains policy questions, procedural questions, and instructional or informational questions pertaining to various types of certificate holder requirements such as actions, prohibitions, or resources (i.e., personnel, facilities, equipment, technical data, etc.).

#### Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the information listed in the Supplemental Information section of this DCT.
2.	Review the certificate holder's policies, duties, responsibilities, and authority of the Director of Safety (or equivalent) to ensure that they contain information on who, what, when, where, and how (as appropriate).

#### Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's system state the qualifications, duties, responsibilities, and authority of the Director of Safety (or equivalent):	
1.1.	Does the certificate holder's manual contain general policies on staffing the Director of Safety (or equivalent) position that comply with the SRRs? SRRs: 119.65(a)(1); 119.65(c); 121.135(b)(1); 119.65(b); A.006 <i>Related Design JTIs:</i> 1. Check that the Certificate Holder's manual contains a general policy that a qualified person will serve in the position, or equivalent position of DOS full time. <i>Sources:</i> 119.65(a)(1); 121.135(b)(1) 2. Check that the Certificate Holder's manual contains a general policy that the DOS, or equivalent will be listed by title on paragraph A006 of the operations specifications. <i>Sources:</i> 119.65(c); 121.135(b)(1); A.006Management Personnel	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2.	Does the certificate holder's manual reference the appropriate Federal Aviation Regulations listed in the Supplemental Information section of this safety attribute inspection (SAI)? SRRs: 121.135(b)(3)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.3.	Does the certificate holder's manual state, in its general policy provisions, the duties, responsibilities, and authority of the Director of Safety (or equivalent) position? SRRs: 119.65(e)(1)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.4.	Does the certificate holder's manual include instructions and information for personnel to meet the requirements of this element?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

	SRRs: 121.135(a)(1)	
1.5.	Does the certificate holder's system provide that the individual who serves as the Director of Safety (or equivalent) must be qualified through training, experience, and expertise? SRRs: 119.65(d)(1)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.6.	Does the certificate holder system provide that the person who serves in the Director of Safety (or equivalent) position must, to the extent of his or her responsibilities, have a full understanding of the following materials with respect to the certificate holder's operation: SRRs: 119.65(d)(2)	
1.6.1	Aviation safety standards and safe operating practices? SRRs: 119.65(d)(2)(i)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.6.2	14 CFR, chapter 1 (Federal Aviation Regulations)? SRRs: 119.65(d)(2)(ii)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.6.3	The certificate holder's operations specifications? SRRs: 119.65(d)(2)(iii)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.6.4	All appropriate maintenance and airworthiness requirements of 14 CFR (e.g., parts 1, 21, 23, 25, 43, 45, 47, 65, 91, and 121)? SRRs: 119.65(d)(2)(iv)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.6.5	The certificate holder's manual required by 14 CFR part 121, section 121.133? SRRs: 119.65(d)(2)(v)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.7.	Does the certificate holder's system provide that the person who serves as the Director of Safety (or equivalent) must discharge his or her duties to meet the applicable legal requirements and to maintain safe operations? SRRs: 119.65(d)(3)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.8.	Does the certificate holder's manual contain the name and business address for the Director of Safety (or equivalent)? SRRs: 119.65(e)(2); A.006	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.9.	Does the certificate holder's system direct the appropriate management personnel to notify the certificate-holding district office within 10 days of any change to or the vacancy of the Director of Safety (or equivalent) position?  SRRs: 119.65(e)(3) <i>Related Design JTIs:</i> 1. Check that the Certificate Holder's manual include instructions and information necessary to allow personnel concerned to perform the duty and responsibility to notify the certificate holding district office within 10 days of a change in personnel or a vacancy in the DOS position. <i>Sources:</i> 119.65(e)(3); 121.135(a)(1) <i>Interfaces:</i> 1.3.14(AW); 2.1.2(AW); 2.1.2(OP)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.10.	Does the certificate holder s manual contain the required references to, or excerpts from, the operations specifications listed in the Supplemental Information section of this safety attribute inspection (SAI)? SRRs: 119.43(b)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.11.	If the certificate holder's manual includes excerpts from its operations specifications, are the excerpts clearly identified as part of the operations	<input type="checkbox"/> Yes

	specifications? SRRs: 119.43(b)(1)	<input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.12.	Does the certificate holder s manual require compliance with operations specifications listed in the Supplemental Information section of this safety attribute inspection (SAI)? SRRs: 119.43(b)(2)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.13.	Does the certificate holder s system contain a method for keeping all persons engaged in its operations informed of the provisions of the operations specifications listed in the Supplemental Information section of this safety attribute inspection (SAI)? SRRs: 119.43(c)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>SAI Section 1 - Procedures Attribute Drop-Down Menu</b>	
1.	No procedures, policy, instructions or information specified.
2.	Procedures or instructions and information do not identify (who, what, when, where, how).
3.	Procedures, policy or instructions and information do not comply with CFR.
4.	Procedures, policy or instructions and information do not comply with FAA policy and guidance.
5.	Procedures, policy or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen's Charts, etc.).
6.	Procedures, policy or instructions and information unclear or incomplete.
7.	Documentation quality (e.g., unreadable or illegible).
8.	Procedures, policy or instructions and information inconsistent across Certificate Holder manuals (FOM - Flight Operations Manual to GMM - General Maintenance Manual, etc.).
9.	Procedures, policy or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).
10.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
11.	Other.

### SAI Section 2 - Controls Attribute

**Objective:** Controls are checks and restraints designed into a process to ensure a desired result. The questions in this section of the DCT are designed to assist the inspector in determining if checks and restraints are designed into the process to ensure the desired result is achieved. Controls should be written into the system to ensure that the most important policies, procedures, or instructions and information will be followed.

Controls may be in the form of administrative controls, which are secondary or supplemental written procedures. Like written procedures, administrative controls also need to provide answers to questions regarding who, what, when, where, and how. Controls may also be in the form of engineered controls, such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.).

#### Tasks

To meet this objective, the inspector must accomplish the following tasks:

1. Review the control questions below.
2. Review the certificate holder's policies, duties, responsibilities, and the authority of the Director of Safety (or equivalent) position.

#### Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Are the following controls established for the Director of Safety (or equivalent):	
1.1.	Is there a control in place to ensure that the Director of Safety (or equivalent) position is occupied?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2.	Is there a control in place to ensure that the Director of Safety (or equivalent) meets the qualifications stated in 14 CFR part 119, section 119.65, and in the certificate holder's manual?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.3.	Is there a control in place to ensure that the Director of Safety (or equivalent) performs the duties of the position full time?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.	Does the certificate holder have a documented method for assessing the impact of any changes made to the controls in the Director of Safety (or equivalent) position?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>SAI Section 2 - Controls Attribute Drop-Down Menu</b>	
1.	No controls specified.
2.	Documentation for the controls do not identify (who, what, when, where, how).
3.	Controls incomplete.
4.	Controls could be circumvented.
5.	Controls could be unenforceable.
6.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
7.	Other.



### SAI Section 3 - Process Measurement Attribute

**Objective:** Process measurements are used by the certificate holder to measure and assess its processes, to identify and correct problems or potential problems, and to make improvements to the processes. The questions in this section of the DCT are designed to assist the inspector in determining if the certificate holder measures or assesses information to identify, analyze, and document potential problems with the process. Process measurements are a certificate holder's internal evaluation or auditing of the most important policies, procedures, or instructions and information associated with an element.

To prevent the duplication of work, process measurements are most commonly addressed through a combination of auditing features contained in both the certificate holder's safety program/internal evaluation program (for operations and cabin safety-related issues) and the auditing function of the Continuous Analysis and Surveillance System (for airworthiness or maintenance/inspection-related issues). The director of safety and the quality assurance department often work together to accomplish this function for the certificate holder. This approach requires amendment of the safety program/internal evaluation program audit forms or checklists and the Continuous Analysis and Surveillance System audit forms or checklists to include the specific process measurements for each element.

#### Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the process measurement questions below.
2.	Review the certificate holder's policies, duties, responsibilities, and the authority of the Director of Safety (or equivalent) position.

#### Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's system include the following process measurements for the Director of Safety (or equivalent):	
1.1.	Process measurements that would reveal when the certificate holder does not fill the Director of Safety (or equivalent) position?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2.	Process measurements that would reveal when the certificate holder assigned an individual as the Director of Safety (or equivalent) who did not meet the qualifications as stated in the 14 CFR part 119, section 119.65, and the certificate holder's manual?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.3.	Process measurements that would reveal when the certificate holder failed to ensure that the Director of Safety (or equivalent) satisfactorily fulfilled the duties of the position full time?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>SAI Section 3 - Process Measurement Attribute Drop-Down Menu</b>	
1.	No process measurements specified.
2.	Documentation for the process measurements does not identify (who, what, when, where, how).
3.	Inability to identify negative findings.
4.	No provisions for implementing corrective actions.
5.	Ineffective follow-up to determine effectiveness of corrective actions.
6.	Resources requirements (personnel, facilities, equipment, technical data).
7.	Other.

### SAI Section 4 - Interfaces Attribute

**Objective:** Interfaces are used by the certificate holder to identify and manage the interactions between processes. The questions in this section of the DCT are designed to assist the inspector in determining whether or not interactions between the policies, procedures, or instructions and information associated with other independent processes within the certificate holder's organization are documented. Written policies, procedures, or instructions and information that are interrelated and located in different areas within the certificate holder's system must be consistent and complement each other. For the interfaces to be effectively managed, the certificate holder's system should identify and document the interfaces.

#### Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the interfaces associated with the Director of Safety (or equivalent) that have been identified along with the individual questions in section 1, Procedures, of this DCT.
2.	Review the certificate holder's policies, duties, responsibilities, and the authority of the Director of Safety (or equivalent) position.

#### Questions

	To meet this objective, the inspector must answer the following questions:	
	NOTE: The design job task items (JTIs) displayed with the questions in section 1, Procedures, of this DCT identify potential interfaces (by element number) for this element.	
1.	Does the certificate holder's system properly address the interfaces that are identified along with the questions in the section 1, Procedures, of this DCT?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.	Does the certificate holder document a method for assessing the impact of any changes to the associated interfaces within the Director of Safety (or equivalent) process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>SAI Section 4 - Interfaces Attribute Drop-Down Menu</b>	
1.	No interfaces specified.
2.	The following interfaces not identified within the Certificate Holder's manual system:
3.	Interfaces listed are inaccurate.
4.	Specific location of interfaces not identified within the manual system.
5.	Other

### SAI Section 5 - Management Responsibility & Authority Attributes

**Objective:** The questions in this section of the DCT address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

#### **Tasks**

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the appropriate organizational chart.
2.	Record the name and title of the individual serving as the Director of Safety (or equivalent).
3.	Review the duties and responsibilities for the Director of Safety (or equivalent).

#### **Questions**

	To meet this objective, the inspector must answer the following questions:	
1.	Is there a clearly identifiable person performing the duties and responsibilities of the Director of Safety (or equivalent) position?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title:
2.	Is there a clearly identifiable person who has authority of the Director of Safety (or equivalent) position?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title:
3.	Are the certificate holder's procedures for the delegation of authority for the Director of Safety (or equivalent) clearly and completely documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>SAI Section 5 - Management Responsibility &amp; Authority Attributes Drop-Down Menu</b>	
1.	Not documented.
2.	Documentation unclear.
3.	Documentation incomplete.
4.	Other.