United States Department of the Interior
Office of Aviation Services
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Boise, Idaho 83706-3991

DOI OPERATIONAL PROCEDURES MEMORANDUM (OPM) - 25

Subject: Safety Management Systems (SMS) Evaluator Criteria

Effective Date: January 1, 2026

Last Updated: December 5, 2024

Expiration Date: December 31, 2026

1. **Summary of Changes.**

   The Executive Aviation Subcommittee (EAS) reviewed and concurred with the following changes.
   - Updated reference to new FAA SMS requirements and revised definitions in Appendix 1.

2. **Purpose.** The purpose of this OPM is to provide the Department of the Interior with policy on the qualifications, selection, training, and conduct of individuals selected to evaluate Safety Management System (SMS) compliance for contracted aviation services.

3. **Authority.** This policy is established by the Director, Department of the Interior (DOI or Department), Office of Aviation Services (OAS) in accordance with the provisions of Departmental Manual 112 DM 12, 350 DM 1 and Secretarial Order 3322 dated August 23, 2012.

4. **Scope.** This policy covers DOI contracted flight services where 1) SMS has been incorporated as part of the contract and 2) contractor is operating under FAA Part 135 or § 91.147 where SMS is required (refer to FAA AC 120-92D, Safety Management Systems for Aviation Service Providers). Within the body of this document, the use of the term "bureau" is intended to represent all Interior operating entities such as service, office, survey, etc. This OPM is limited to SMS assurance activities and does not apply to other quality assurance/oversight activities.

5. Introduction. Aviation Safety Management System (SMS) is an approach to managing aviation safety that includes the formal, top-down, business-like approach to managing and reducing risk, which includes a systemic approach to managing safety, including the necessary organizational structures, accountabilities, policies, and procedures. SMS is an evolutionary development in aviation safety as it creates structured, repeatable, and proactive systems that can reduce aviation risk to the contractor and the government employees that use their services. Many of the contract solicitations for aviation services include language that ask the vendor to describe and document elements of their SMS in order to effectively evaluate their safety culture. Evaluating written industry SMS proposals in the source selection process and determining compliance post-contract award will be accomplished by qualified SMS Evaluators. SMS Evaluators require a unique combination of aviation experience and organizational assessment in order to effectively evaluate the effectiveness and conformity of an organization's SMS.

6. Policy.

A. Bureau personnel nominated for the role of SMS Evaluator require an endorsement from their respective National Aviation Manager. Such endorsement should be based on aviation knowledge, experience, and personal suitability. Specific areas of experience should include aviation operations or maintenance and possess a working knowledge of aviation SMS and related protocols.

7. Roles and Responsibilities.

A. OAS Chief of Aviation Safety, Training, Program Evaluation, and Quality Management:

1) Will review and approve SMS Evaluator nominees.

2) Maintain a list of recognized SMS accrediting entities and approved SMS training courses.

3) Review select field SMS evaluation results and forward to the Contracting Officer for inclusion into CPARs.

4) Revoke SMS Evaluator designations for lack of currency or conduct.

B. National Aviation Manager:

1) Nominate bureau personnel to serve as a Bureau SMS Evaluator.

2) Revoke SMS Evaluator designations for currency or conduct.

3) Notify the OAS Chief of Aviation Safety, Training, Program Evaluation, and Quality Management of any revocations or related issues.

C. Bureau SMS Evaluator Nominees:

1) SMS Evaluator nominees will attend an OAS approved SMS auditor training course.

2) Will complete an SMS evaluation with a qualified SMS Evaluator who will act as the lead Evaluator prior to obtaining the SMS Evaluator designation.

D. Bureau SMS Evaluators

1) Once designated, each evaluator will complete at least one field SMS evaluation per 36 months to maintain currency. Evaluators who fail to maintain currency can requalify after completing a field SMS evaluation with a current SMS Evaluator.

2) Coordinate with OAS SMS Coordinator and OAS/bureau inspection teams to reduce redundancy and concurrent inspections in the interest of minimizing the burden to contractors/impact on operations.

3) Send results to the OAS SMS Coordinator.

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Susan E. Bates
Director, Office of Aviation Services

Attachments:
Appendix 1: Definitions

Appendix 1
Definitions

The following definitions are provided to facilitate a common terminology used by the SMS Evaluators and vendors.

Acceptable Level of Risk
The risk tolerance or safety expectations of an operator and the government customers or an agency involved in safety oversight.

Accident
An occurrence associated with the operation of an aircraft that takes place between the time any person boards the aircraft with the intention of flight, and all such persons have disembarked, and in which any person suffers death or serious injury, or in which the aircraft receives substantial damage [Title 49 of the Code of Federal Regulations (49 CFR) § 830.2, Definitions]

Accountabilities
The sum of duties and responsibilities assigned to personnel.

Analysis
The conversion of data into information to identify measures that predict safety-related problems to allow risk management decision making, by the identification of trends, deficiencies, and root causes. This involves the processes of identifying a question or issue to be addressed, modeling the issue, investigating model results, interpreting the results, and possibly making a recommendation. Analysis typically involves using scientific or mathematical methods for evaluation.

Assessment
The process of measuring or judging the value or level of something.

Audit (synonymous with evaluation)
Scheduled reviews and verifications that evaluate whether an organization has complied with policy, standards, and/or contract requirements.

Authority
Who can direct, control, or change the process as well as who can make key decisions such as risk acceptance.

Competency
An observable, measurable set (pattern) of skills, knowledge abilities, behaviors, and other characteristics required of an individual to perform work roles of occupational functions successfully. Competencies are typically required at different levels of proficiency, depending on the work roles or occupational function. Competencies can help ensure that individual and team performances align with the organization's mission and strategic direction.

Conformity
Fulfilling or complying with a requirement (refer to ISO 9001:2015); this includes, but is not limited to, complying with Federal Aviation Administration (FAA) regulations. It also includes complying with company requirements, requirements of operator developed risk controls, or operator policies and procedures.

Continuous Monitoring
Uninterrupted (constant) watchfulness (checks, audits, etc.) over a system.

Controls
Controls are elements of the system, including hardware, software, special procedures, or procedural steps, and supervisory practices designed to keep processes on-track to achieve their intended results. Organizational process controls are typically defined in terms of special procedures, supervisory and management practices, and processes. Many controls are inherent features of the FAA SMS Framework. Practices such as continuous monitoring, internal audits, internal evaluations, and management reviews [all parts of the Safety Assurance (SA) component] are identified as controls within the design expectations. Additionally, other practices such as documentation, process reviews, and data tracking are identified as controls within specific elements and processes.

Corrective Action
Action to eliminate, or mitigate, the cause or to reduce the effects of a detected nonconformity or other undesirable situation.

Culture
The values, beliefs, and behaviors of the group.

Documentation
Information or meaningful data and its supporting medium (e.g., paper, electronic). In this context, documentation is different from records, because documentation is the written description of policies, processes, procedures, objectives, requirements, authorities, responsibilities, or work instructions. By contrast, records are the evidence of results achieved, or activities performed.

Function
A function consists of specific or discreet actions required by a system to achieve an objective (e.g., an operation that a system must perform to accomplish its mission, such as a maintenance action required to restore a system to operation). Such actions may be accomplished using equipment, personnel, facilities, firmware, software, or a combination thereof. In a broader sense, the term function refers to what is expected to be incorporated into each system rather than how the system accomplishes its objective. This makes for a more performance-based system and allows for a broad range of techniques to be used to accomplish the performance objectives. This, in turn, maximizes scalability while preserving standardization of results across the aviation organization communities.

Hazard
Any existing or potential condition that can lead to injury, illness, or death; damage to or loss of a system, equipment, or property; or damage to the environment (environmental issues are not within the scope of the SMS). A hazard is a condition that might cause (is a prerequisite to) an accident or incident.

Incident
An occurrence other than an accident, associated with the operation of an aircraft, which affects or could affect the safety of operations (49 CFR § 830.2, Definitions).

Lapse
A failure of memory, such as when we either forget what we had planned to do or omit an item in a planned sequence of actions.

Lessons Learned
Knowledge or understanding gained by experience, which may be positive, such as a successful test or mission or negative, such as a mishap or failure. Lessons learned should be developed from information obtained from inside and outside of the organization and/or industry.

Likelihood
The estimated probability or frequency, in quantitative or qualitative terms, of an occurrence related to the hazard.

Mitigation
The measures taken to remove a hazard, or to reduce the likelihood or severity of a risk.

Objective
The desired state or performance target of a process. Usually, it is the final state of a process and contains the results and outputs used to obtain the desired state or performance target.

Outputs
The product or end-result of an SMS process, which can be recorded, monitored, measured, and analyzed. Outputs are the minimum expectation for the product of each process area and the input for the next process area in succession. Each of the outputs of a process should have a method of measurement specified by the organization. Measures need not be quantitative where this is not practical however, some method of providing objective evidence of the attainment of the expected output is necessary.

Preventive Action
Preemptive action to eliminate or mitigate the potential cause or reduce the future effects of an identified or anticipated nonconformity or another undesirable situation.

Procedure
Specified ways to carry out operational activities that translate the "what" (objectives) into "how" (practical activities).

Process Measures
Ways to provide feedback to responsible parties that require actions are taking place, required outputs are being produced, and expected outcomes are being achieved. A basic principle of Safety Assurance is that fundamental processes be measured so that management decisions can be data driven.

Process
A set of interrelated or interacting activities that transform inputs into outputs.

Records
Evidence results have been achieved or activities performed (also see "documentation" above).

Residual Safety Risk
The safety risk that exists after mitigation has been accomplished or all controls have been implemented or exhausted and verified. Only verified controls can be used for assessing residual safety risk.

Responsibility
Who is accountable for management and overall quality of the process (planning, organizing, directing, controlling) and its ultimate accomplishment.

Risk
The composite of predicted severity (how bad) and the likelihood (how probable) of the potential effect of a hazard in its worst credible (reasonable or believable) system state. The terms "risk" and "safety risk" are interchangeable for the purposes of this document.

Risk Control
Steps taken to eliminate (remove) hazards or to mitigate (lessen) their effects by reducing the severity and/or likelihood of risk associated with those hazards.

Safety
The state in which the risk to harm persons, or damage to property, is reduced to and maintained at or below an acceptable level, through a continuing process of hazard identification and risk management.

Safety Assurance (SA)
Processes within the SMS that function systematically to ensure the performance and effectiveness of safety risk controls and that the organization meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Safety Culture
The product of individual and group values, attitudes, competencies, and patterns of behavior that determine the commitment to, and the style and proficiency of the organization's management of safety. Organizations with a positive safety culture are characterized by communications founded on mutual trust, by shared perceptions of the importance of safety, and by confidence in the efficacy of preventive measures.

Safety Management System (SMS)
The formal, top-down, organization-wide approach to managing safety risk and ensuring the effectiveness of safety risk controls. It includes systematic procedures, practices, and policies for the management of safety risk.

Safety Objective
A measurable goal or desirable outcome related to safety.

Safety Policy
A documented organizational commitment to safety, which defines safety objectives and the accountabilities and responsibilities of its employees regarding safety.

Safety Promotion
A combination of training and communication of safety information to support the implementation and operation of an SMS in an organization.

Safety Risk Management (SRM)
A process within the SMS composed of describing the system, identifying the hazards, and analyzing, assessing, and controlling risk.

Severity
The degree of loss or harm resulting from a hazard.

Slip
An action which is not carried out as planned (generally referring to timeframe goals).

Strategic Safety Objective
The safety performance expectations of an operator, a service provider, or an agency involved in safety oversight.

System Safety Deficiency
The circumstance that permits hazards of a like nature to exist.

System
An integrated set of constituent elements that are combined in an operational or support environment to accomplish a defined objective. These elements include people, hardware, software, firmware, information, procedures, facilities, services, and other support facets.

Violation
Deliberate act contrary to a rule or procedure, or a "work around".