This Just-in-Time (JiT) document FAA DCT Changes Related to SMS (Revision 0, dated July 28, 2025) is meant to assist in communicating additional SMS related information to aviation organizations with an interest in FAA Data Collection Tools. This document is intended to be informational in nature and does not supersede federal aviation regulations nor FAA policies. This product may be amended with additional pertinent information, as applicable.

Changes to FAA Data Collection Tools (DCT) Questions related to SMS

Aviation Organizations that have implemented an SMS, either as required by 14 CFR part 5 or through the SMS Voluntary Program (SMSVP) should be aware of changes to the FAA's Safety Assurance System (SAS) Data Collection Tools (DCTs). SAS is the FAA's standardized risk-based, data-supported oversight system for commercial operations. These changes may also be of interest to aviation organizations or applicants with SAS External Portal Access.

In conjunction with the SAS 4.6 update (effective July 2025), the FAA removed the Controls and Process Measurement Safety Attribute questions from System and Element Performance Data Collection Tools. (SP/EP DCTs)

This change supports the FAA's broader effort to modernize oversight practices by emphasizing performance-based tools and enhancing the utility of safety data at both local and national levels. The FAA created New Safety Risk Management (SRM) and Safety Assurance (SA) Questions to replace "Controls" and Process Measurement" questions for all aviation organizations with an SMS.

The Controls and Process Measurement questions were originally designed to capture safety management principles. However, with the addition of dedicated SA and SRM Questions in System or Subsystem Performance (SP) and Element Performance (EP) DCTs, these legacy Safety Attribute questions became duplicative.

Aviation organizations utilizing FAA's DCTs should become familiar with the newly added SRM and SA questions to be better able to assess how their organization applies SMS principles to their technical and managerial processes.

Examples of these global Safety Assurance and Safety Risk Management Question are listed below and are applicable to all aviation organizations with an SMS:

SA	**Question:** Best describe how the certificate holder applied Safety Assurance processes to perform safety assurance monitoring and measurement, safety performance assessment, and continuous improvement for this element's processes.
SRM	**Question:** Best describe how the certificate holder applied Safety Risk Management (SRM) processes to perform system analysis, to identify hazard(s), conduct safety risk assessment(s), and evaluate control(s) for this element's processes.

Available answers include the following responses:

The SA/SRM processes were effective
Isolated instance(s) when the SA/SRM processes were not effective
Several instances when SA/SRM processes were not effective
Systemic, significant issues, or regulatory non-compliance
Not Observable
Not Required

FAA SAS DCTs may be accessed via the Dynamic Regulatory System (DRS), under the SAS link in the left-hand menu column, and under the SAS FS Data Collection Tools (DCT) link.

Aviation organizations not required by regulation to develop and implement an SMS should still consider strengthening their technical and managerial processes by infusing system safety attributes into their operations. Additional information about System Safety Attributes is available on the FAA's Aviation Safety Outreach page.