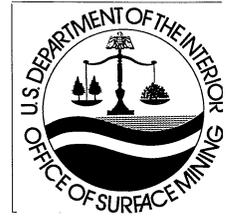


Applicant/Violator System Office System Advisory Memorandum



SAM # 10 DATE: June 19, 2009

Subject: DUPLICATE ENTITIES

This System Advisory Memorandum discusses the problems with and the prevention of duplicate entities in the Applicant/Violator System (AVS). This SAM replaces previous SAM # 8, "Multiple Entities," dated January 23, 1998.

Why is this guidance necessary?

Duplicate entity records create problems for all AVS users, including unnecessarily enlarging entity and OFT records and making information updates very difficult. Duplicate records for the same entity also compromise the accuracy of AVS data and system operation and may cause inaccurate results when evaluating applications or entities or generating reports. It is unnecessary, for example, to create an entity more than once to show that a person holds or held more than one relationship in a business entity. While "entity" is not a defined regulatory term, an entity record in AVS means an automated record of anything that meets the regulatory definition of *person* at 30 CFR 700.5.

The AVS Office reviews all newly-created entity records to ensure the records are created accurately and provides individual guidance to users when anomalies are encountered. However, we believe the most efficient and effective operation of AVS relies upon preventing the creation of duplicate entities.

How do I search AVS to avoid creating a duplicate entity?

It is critical that regulatory authorities are careful when creating new entities in AVS so as not to duplicate an existing entity record. Before creating a new entity record, search the last name of the individual or the business name to determine if there is an existing record of the entity. We highly recommend entering only the first several letters, also called "character strings," to perform your search, as this will maximize the probability that if there already is a record for the entity you seek, you will find it among the retrieved group of possible matches. Consider also searching using probable misspellings of the entity's name. If an individual is known by a middle name or nickname, search for an existing record using these parameters as well.

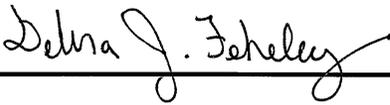
SAM # 10
June 19, 2009
page 2

What should I do if I identify a potential duplicate entity?

If you believe you have identified or accidentally created a duplicate entity record, please contact the AVS Office at once. We will work with you to determine the best resolution.

Where can I obtain more information on avoiding duplicate entities?

If you have questions regarding duplicate entities in AVS, please contact your AVS User Assistance Liaison at 1.800.643.9748.

Signed: 

**Debra J. Feheley, Chief
Applicant/Violator System Office**