

**TR:** 16542  
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**TITLE:** Sanctions and SPAL Overpayments  
**Submitted:** 02/2013  
**Agency:** CAOs  
**Program:**  
**CITATIONS:**

**Question:**

When the CAO determines that a TANF Sanction is valid after conducting a compliance review should we also review SPALS that were authorized for RESET participation to evaluate whether an overpayment should be processed?

**RESPONSE:** Division of Employment and Training

Yes. OPS Memo 11-06-02 discusses processing overpayments to recover a SPAL to the extent of the misuse calculated based on a prorated period of participation to reflect the time the client actually complied with the activity based on a weekly or monthly proration. When a client is sanctioned due to noncompliance, consideration should also be given to the SPALS that were authorized for participation during the period of noncompliance.