pennsylvania
DEPARTMENT OF COMMUNITY
& ECONOMIC DEVELOPMENT

CENTER FOR COMMUNITY SERVICES DIRECTIVE

Title: Reporting Requirements
Directive #: C2022-05
Effective: November 1, 2022

To: Community Services Block Grant Subgrantees
From: Denise Remillard, Director – Center for Community Services

1.0 Purpose

This directive provides information related to Community Services Block Grant (CSBG) reporting requirements for eligible entities and programs funded by CSBG.

2.0 Revision History

This CSBG Directive is effective November 1, 2022, and replaces C2019-05.

3.0 Policy

CSBG eligible entities (CEE) including community action agencies (CAA) and limited-purpose agencies (LPA) must routinely report program and service outcomes, compliance with Organizational Standards, and both tripartite board and key agency staff changes. The Community Organization Planning and Outcome System (COPOS) is the Department's electronic reporting system that collects information regarding agencies, programs, and services administered by Pennsylvania's CSBG network.

COPOS

COPOS is the official system of record for collecting Organizational Standard, program, and service data from CEEs. CEEs and tripartite boards can leverage COPOS data to prioritize resources and achieve outcomes that are established federally, statewide, or locally. Through COPOS reporting, the Department collects quantitative and qualitative data from Pennsylvania's network of CSBG eligible entities in support of CSBG Organizational Standards and the federal CSBG Annual Report on behalf of the federal Department of Health and Human Services (HHS). The Department along with HHS use information collected in COPOS to improve performance, track results from year to year, and assure accountability for critical outcomes. COPOS is accessible at: https://pa-copos.dced.pa.gov/ . Refer to the current COPOS User Manual found in COPOS Help for information about how to request or modify access, specific data entry instructions, and reporting guidance.

Organizational Standards

HHS requires states to ensure CSBG eligible entities meet all Organizational Standards. As part of the Department's effort to ensure compliance, all eligible entities must continually review and update their documentation of compliance with Organizational Standards via COPOS. Refer to CSBG Directive C2022-07 for details related to CSBG Organizational Standards.

Each Organizational Standard must be validated and approved by each agency's Executive Director. Organizational Standards require documentation that must be uploaded to COPOS. The Department reviews Organizational Standard documentation at the time of submission and will issue a response to the agency if the document is not appropriate to meet the standard. The department will also review documentation and compliance as a part of the Risk Assessment and monitoring. Organizational Standard compliance and achievement is reported federally through the CSBG State Plan and CSBG Annual Report. Please see Directive C2022-07 for guidance on the required documentation and timelines.

Tripartite Board and Key Agency Staff

Routine entries and updates in COPOS related to tripartite board membership and agency key staff are required. Agencies must accurately identify board composition by sector, term begin and end dates (if applicable), and any vacancies. Additionally, primary agency program, fiscal, or administrative staff associated with the administration of CSBG must be identified. This information should be updated as often as necessary, with quarterly review and attestation in COPOS by the agency's executive director or an agency delegate assigned by the executive director.

CSBG Annual Report

The CSBG Annual Report is submitted by the Department to HHS annually in March. The report is part of the greater CSBG Performance Management Framework and continuous improvement efforts. The CSBG Annual Report supports an enhanced focus on improved data collection, analysis, and continuous learning, and captures outcomes of individuals, households, and communities whether funded directly with CSBG or through the agency's leverage of other resources.

The CSBG Annual Report is divided into four (4) modules along with Agency Highlights that each capture data from different aspects of CSBG operations. CEEs are responsible for providing program and service data related to Agency Highlights along with Modules 2, 3, and 4. Data collection for all modules is based on Pennsylvania's CSBG calendar year reporting period of January through December.

Module 1 – State Administration

> Module 1 is the State Administration section of the CSBG Annual Report and is completed by the Department. The Department uses this section to report the administration of CSBG funding and distribution to eligible entities, including discretionary funds and training and technical assistance (T/TA) funds. The Department is also required to report information regarding eligible entity achievement of Organizational Standards and other accountability measures related to monitoring, T/TA, and other critical areas.

Module 2 – CSBG Eligible Entity Expenditures, Capacity, and Resources

Module 2 must be completed by all CEEs. It is comprised of three sections in COPOS:

> Section A – The CSBG Expenditures by CSBG Eligible Entity data entry form meets the Congressional requirement for an explanation of the total amount of CSBG funding expended during the reporting period based on categories referenced in the federal CSBG Act.

> Section B – The CSBG Eligible Entity Capacity Building data entry form captures details about agency capacity building efforts and activities that are funded by CSBG and other funding sources.

> Section C – The Allocated Resources per CSBG Eligible Entity data entry form captures data about resources allocated to, administered through, and generated by each agency. It captures valuable information about how CSBG leverages funds as required by the federal CSBG Act from other federal, state, local, and private sources.

Module 3 – Community Level

Module 3 must be completed by all CEEs doing community level work for each initiative or project. It is comprised of two sections:

> Section A - The Community Initiative Status Form identifies agency initiatives intended to achieve community-level outcomes. It is a central place to report valuable information about each initiative that started, continued, or ended during the reporting period. Each initiative must be updated based on each initiative's progress. Section A of Module 3 must be entered in COPOS as soon as possible once initiative planning begins, and as often as needed whenever community-level initiatives are implemented. Community-level initiatives entered in COPOS should be routinely reviewed at least quarterly, particularly at the beginning of each reporting year and as reporting targets are identified or modified throughout the initiative's development and implementation.

> Note: Module 3 A questions 1 through 11 are copied over to the new year to minimize re-entry. As such, Section A must be finalized before the Copy Over process runs each year in order to minimize manual data entry. The Copy Over process run date varies from year to year, with the date being announced in advance.

> Section B – Once an agency identifies a community-level initiative by creating Section A, the Community National Performance Indicators (CNPI) data entry form facilitates the reporting, use, and learning from CNPIs by allowing two types of indicators – Counts of Change and Rates of Change. Based on the community-level work the agency identifies and reports in Section A, the agency must indicate the appropriate CNPIs, targets, and outcomes. CNPIs and targets in Section B must be entered at the beginning of each calendar year and as often as needed whenever community-level initiatives are implemented or active. Outcomes in Section B of Module 3 must be entered and validated in COPOS whenever a community-level initiative ends, or annually in accordance with CSBG Annual Report timelines if the initiative remains active.

Module 4 – Individual and Family Level

Module 4 must be completed by all CEEs. It is comprised of three sections:

Section A – The Individual and Family National Performance Indicators (FNPI) data entry form captures outcomes of individuals and households benefitting from the agency's services and programs. The Section A data entry forms consists of:

- Proposed targets based on the agency's goals that must be entered at the beginning of the calendar year,
- Quarterly outcomes that demonstrate the agency's progress toward achieving goals, and
- Annual outcomes entered upon conclusion of the calendar year.

Section B – The Individual and Family Services (SRV) data entry form captures unduplicated counts of individuals and households receiving any of the services listed on the agency's Individual and Family Services form. This standardized process of data collection assists in the analysis of the relationship between people, services, and outcomes.

Section C – The All Characteristics Report Data Entry Form collects data about all individuals and households served by the agency. This demographic information strengthens the reporting process by identifying the characteristics of individuals and households served by CEEs.

Agency Highlights

The Agency Highlights section in COPOS provides an opportunity for CEEs to showcase and highlight achievements and innovations. This includes summarizations of how the CEE delivers high quality, accessible, and well-managed programs and services. Through continuous quality improvement methodologies including ROMA, agencies can demonstrate how resources are mobilized to support innovative solutions and analytic approaches.

Reporting Schedule

COPOS Reporting Section	Type of Information	Frequency
Organizational Standards	Documentation and attestation of compliance.	Please refer to Directive C2022-07.
Board Management and Agency Key Staff	Identification of board composition by sector and member, and identification of supervisory or management level CSBG staff.	Routinely and as frequently as necessary. Board vacancies must be identified promptly when they occur. Quarterly attestation by agency executive director.
Module 2	Annual reporting of agency expenditures, capacities, and resources.	Annually.
Module 3A	Community-level initiative inception data.	Routinely when new community-level initiatives are identified and implemented. Annually to report progress and outcomes. Note: due to the Copy Over

		process, Module 3 must be finalized prior to the copy over process run date.
Module 3B	Community-level initiative outcome data.	Annually when outcomes are produced
Module 4A	Individual and Family National Performance Indicators (FNPI).	Quarterly and annually.
Module 4B	Individual and Family Services (SRV).	Annually.
Module 4C	All characteristics report data entry form.	Annually.
Agency Highlights	Agency achievements and innovations.	Annually.

CEEs must adhere to the following reporting schedule for COPOS data entry:

Community-level initiatives in Module 3: Community-level initiatives must be reported in COPOS at their inception. Section A must be completed during the planning and implementation phase of the initiative. Upon creation of the initiative in Module 3A, targets or baselines that correspond with the initiative's purpose and goals should be identified in Module 3B, particularly outcomes that are anticipated within the same calendar year. Some initiatives that are multi-year will have variable targets and baselines that change from year to year. Module 3B targets or baselines are focused on the year in which the specific outcomes can be reported. Upon conclusion of the calendar year and in accordance with the CSBG Annual Report timeline, CEEs must report all accomplishments that occurred during the year and consequently update any targets or baselines for the coming year.

Targets or baselines in COPOS Module 4A: The number of individuals and households that will be served as determined by the community needs assessment (CNA) and CSBG Work Plan must be identified at the beginning of the calendar year. The proposed targets entered into COPOS forecast the work that will be performed by the CEE as the calendar year progresses. Targets are entered into Module 4A from the Work Plan. The due date for the Work Plan is established when funding allocations become available. Targets should be projected in concurrence with the tripartite board. From time to time, a CEE may introduce a new initiative or program during the year and consequently seek to refine or adjust its existing programming including the previously identified targets or baselines. CEEs may edit or change targets after the lock-out date only by sending an e-mail to their Program Specialist requesting that the Work Plan be sent back for these changes.

Quarterly and annual outcomes and achievements in COPOS Module 4A: Quarterly reports for FNPIs are due four times during the calendar year at three-month intervals. Reporting for each quarterly outcome is year-to-date and should be a cumulative tabulation for the calendar year. Quarterly reports are due typically within 30 calendar days following the end of each quarter. The final quarter, and thus the year-ending report that comprises the CSBG Annual Report, is due typically within 45 calendar days after the end of the calendar year. The exact due dates for each of the four quarters are displayed within COPOS. Data must be entered in COPOS by the lock-out dates to allow sufficient time for the Department to review and analyze the data before submitting it to meet the federally mandated deadline.

Annual reporting in COPOS Module 2: Annual agency expenditures, capacities, and resources must be reported in Module 2. These elements of program administration include the identification of federal, state, and local resources that were leveraged to support and enhance CSBG programming and funding. This includes training and agency capacity building, as well as identification of volunteer hours and participation in support of agency operations. Module 2 annual reporting is due typically within 45 calendar days after the end of the calendar year. Data must be entered by the lock-out dates identified in

COPOS to allow sufficient time for the Department to review and analyze the data before submitting it to meet the federally mandated deadline.

Annual outcomes and achievements in COPOS Modules 3B, 4A, 4B, and 4C: Annual outcomes and achievements in each Module, along with Agency Highlights, are due within 45 calendar days after the end of the calendar year. While Module 3B enumerates year-end outcomes for community-level initiatives, and Module 4A is associated with individual and family level indicators, Modules 4B and 4C identify the unduplicated SRV counts along with the individual and family level characteristics of those served by the agency's efforts. Module 3B, 4A, 4B, and 4C annual reporting is due typically within 45 calendar days after the end of the calendar year. Data must be entered by the lock-out dates identified in COPOS to allow sufficient time for the Department to review and analyze the data before submitting it to meet the federally mandated deadline.

Failure to meet any of the reporting deadlines may negatively impact the processing of funds and may result in monitoring findings or recommendations. Additionally, agencies may be asked to clarify or modify year-ending data. Both the Department and the federal Office of Community Services (OCS) review the CSBG Annual Report data before formally accepting the report. The review processes identify variances or anomalies that sometimes require agency clarification or correction. CEEs must be prepared to respond promptly to any requests for clarification or correction that result from the CSBG Annual Report review and submission process.

Additional Program Reporting Requirements

Fiscal Status Report (FSR): Monthly invoicing for CSBG is required, and invoices must be accompanied by the agency's most current FSR. Additionally, a final year-ending FSR is required upon expenditure of all CSBG funds received in the calendar year. Refer to Financial Management Center (FMC) Directive 2022-01 for additional details and instructions.

Property Inventory: A Property Inventory Report is due within thirty (30) days of the conclusion of a CSBG contract. Additionally, a current Property Inventory Report may be requested at the time of annual or ad-hoc monitoring. Refer to CSBG Directive CW2018-02, Management of WAP/CSBG Property additional details and the required reporting format.

4.0 Effective Date

This directive takes effect November 1, 2022, and replaces C2019-05. It will remain in effect, in its entirety, until it is amended, replaced, superseded, or nullified. Only a directive from the Department's Center for Community Services or its equivalent may countermand any statement herein contained.

cc: Center for Community Services Staff
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