



Privacy Impact Assessment of Coupa Business Spend Management for Federal (“Coupa”)

System Owner:

Board of Governors of the Federal Reserve System (“Board”) Division of Financial Management

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Description of the IT system:

Coupa Business Spend Management for Federal (Coupa) is a cloud-based, Source to Settle platform designed to manage all aspects of the enterprise acquisition processes including procurement, sourcing, receiving, invoicing, contract management, and supplier management.

To assist the Board with its end-to-end source to settle process, Coupa is used to assist the Board in carrying out the following functions:

- **Supplier Registration and Onboarding:** Coupa is the primary entry portal for Board suppliers to register and update their supplier information. When supplier registrations and revisions are updated in Coupa, new or revised supplier records are reviewed and approved by the Board’s supplier management team before these records are integrated with the Board’s financial functions.
- **Strategic Sourcing and Contracts:** These Coupa functions allow the Board to execute various solicitation events – Requests For Information, Requests For Proposal, and Requests For Quote. The solicitations allow the Board to initiate sourcing events, accept

supplier responses, and perform response evaluations in Coupa before a final supplier award. The award decision will be turned into a contract through Coupa.

- Procure to Invoice: Coupa is utilized to raise procurement requisitions by Business Management Analysts and other qualified Board users. The requisitions undergo budget check and managerial approvals before being converted to Purchase Orders. If there is no available contract to satisfy a requisition need, a requisition can be turned into a sourcing event. Incoming supplier invoices are processed in Coupa for two-way or three-way matching and approved and matched invoices are be sent to the Board's financial functions for payment settlement.
- Supplier Performance Management: Coupa is used to track supplier performances for selected Board suppliers who deliver critical business to the Board.

1. The information concerning individuals that is being collected and/or maintained:

This system collects and uses information from Board employees and contingent workers as users and members of the public as connected to individual external suppliers¹. The specific information for each population appears in Appendix A.

2. Source(s) of each category of information listed in item 1:

The information collected, processed, and maintained in Coupa is only provided by external suppliers and Board authorized users. The Board assigns certain supplier related information that cannot be directly changed by the supplier.

3. Purposes for which the information is being collected:

The information collected, processed, and maintained in Coupa is used to assist the Board in ordering goods and services, distributing solicitations for acquiring goods and services, executing legal contracts to govern the acquisition of goods and services, receiving goods and some services, entering invoices, or approving supplier submitted invoices². The Board will also use Coupa as a tool to measure supplier performance and overall efficiency of the procurement process.

4. Who will have access to the information:

Access to the information maintained in Coupa is limited to authorized users, which consists of Board staff and third-party technical support resources. Access to the information is restricted to that which is required in the performance of the user's duties. This information may be disclosed for the purposes set forth in the System of Records entitled BGFRS-9, "FRB—Supplier Files."

¹ Applicants to positions at the Board who request and receive reimbursement for expenses related to the application process are included as part of the "external supplier" category. All references in this document to "external supplier" are understood to include applicants to positions at the Board.

² Not all instances of vendor/supplier management actions will occur in Coupa. Certain actions, such as leases, are executed in separate systems.

5. Whether the individuals to whom the information pertains have an opportunity to decline to provide the information or to consent to particular uses of the information (other than required or authorized uses):

Suppliers may elect to not provide information. However, suppliers who refuse to use the Coupa system will have to conduct business via an alternate method. If the supplier refuses to divulge required information, the Board will manually enter the supplier's information into Coupa.

The supplier has the option to join the Coupa Supplier Portal (CSP) when invited to do so by the Board. In that case the supplier will be required to accept the terms and conditions from Coupa.

If the supplier does comply with the Board request for information but elects not to join the CSP, the supplier can opt to use a non-CSP method to interact with the Board via email to receive, purchase orders, submit invoices, etc. This method is known as Supplier Activity Notification.

6. Procedure(s) for ensuring that the information maintained is accurate, complete and up-to-date:

Supplier information is initially provided by the supplier. Board staff review and approve this information before a supplier record is generated. The supplier is responsible for reviewing and maintaining accurate information in the system. Should the Board become aware of a discrepancy related to the information in Coupa, a representative may reach out to the supplier for a correction, but the responsibility for accurate information falls on the supplier.

7. The length of time the data will be retained and how will it be purged:

Supplier information is retained for six years after final payment or cancellation of the contract. Data can be requested to be retained longer for business use if authorized.

8. The administrative and technological procedures used to secure the information against unauthorized access:

The Coupa has the ability to track individual user actions within the system. The audit and accountability controls are based on NIST and Board standards which, in turn, are based on applicable laws and regulations. The controls assist in detecting security violations and performance or other issues in the Coupa.

Access to the Coupa is restricted to authorized users within the Board who require access for official business purposes. Users are classified into different roles and common access and usage rights are established for each role. User roles are used to delineate between the different types of access requirements such that users are restricted to data that is required in the performance of their duties.

Periodic audits and reviews are conducted to determine whether users still require access, have the appropriate role, and whether there have been any unauthorized changes in any information maintained in the Coupa.

Appendix A:

Board Employees and Contingent Workers

1. Business Email – **Required**
2. Login – **Required**
3. Single Sign-On ID – **Required**
4. First Name – **Required**
5. Last Name – **Required**
6. Employee Number
7. Phone Number (Work)
8. Phone Number (Work Mobile)
9. Country of Residence
10. Department
11. Approval, Requisition Approval, and Contract Approval Limits (reflective of the responsibilities of an individual's role)
12. Default Chart of Accounts Name
13. Default Account Code Segment 1

External Suppliers

Contact Information (Primary)

1. First and last name - **Required**
2. Email address- **Required**
3. Phone Number (personal) – **Required**
4. Phone Number (work)
5. Contact purpose - **Required**
6. Street Address – **Required**

Contact Information (Secondary)

1. First and last name- **Required**
2. Email address- **Required**
3. Phone Number (personal) - **Required**
4. Phone Number (work)
5. Contact purpose- **Required**
6. Street Address- **Required**

Supplier Information associated with the Contact(s):

1. Supplier Name- **Required**
2. Doing Business As (DBA) Name- **Required**
3. Parent Company Name
4. Organization Type

5. Supplier Type- **Required**
6. Non-taxable Type- **Required**
7. Taxable Type- **Required if taxable**
8. Purchase Order Email Address- **Required**
9. Primary Address (including street address, city, state, and zip code) - **Required**
10. Tax Identification Number
11. Federal Tax ID- **Required**
12. Social Security Number³- **Required if individual**
13. Unique Entity Identifier (UEI) or Data Universal Numbering System (DUNS) Number⁴
14. Tax Region- Indicate location/tax jurisdiction of supplier's registered office- if it is local (U.S.) or foreign (International) – **Required if taxable**
15. Federal Reportable - Indicates if the supplier is required to report federal taxes
16. International Tax Classification - The IRS needs the International/ foreign suppliers to complete Form 1042- Annual Withholding Tax Return for U.S. Source Income of Foreign Persons- to report tax withheld on certain income of foreign persons.
17. Federal Tax Form - Local suppliers select W-9 and foreign suppliers select W-8 and attach your applicable tax form - **Required**
18. W-8BEN - It is an Internal Revenue Service (IRS) mandated form to collect correct Nonresident Alien (NRA) taxpayer information for individuals for reporting purposes and to document their status for tax reporting purposes – **Required if taxable**
19. W-8BEN-E - It is an Internal Revenue Service (IRS) mandated form to collect correct Nonresident Alien (NRA) taxpayer information for entities for reporting purposes and to document their status for tax reporting purpose – **Required if taxable**
20. 8233 - This form is used by nonresident alien individuals to claim exemption from withholding on compensation for personal services because of an income tax treaty or the personal exemption amount allows supplier to provide 8233 certificates with effective and expiration dates.
21. Mode of Payment - **Required**
22. Account Type – **Required**
23. Bank Routing Number – **Required**
24. Bank Account Number – **Required**
25. International Bank Account Number/ Clave Bancaria Esandarizada (IBAN/CLADE)
26. Foreign Beneficiary Bank SWIFT/BIC
27. Foreign Beneficiary Bank Details
28. U.S. Correspondent Bank Routing Number – **Required**
29. U.S. Correspondent Bank Details - International/ foreign suppliers needs to submit US Corresponding Bank details such as Bank Name, Bank Address, Bank Account Number, Bank Routing Number if they choose 'Wire' as 'Mode of Payment' – **Required**

³ SSN is only captured when a Federal Tax ID/Tax Identification Number is not available.

⁴ The supplier's DUNS number is a unique, nine-digit numerical identifier that is assigned to a single business entity. UEI is a number issued by the System for Award Management at the General Services Administration to identify businesses and other entities that do business with the federal government. The UEI has replaced the DUNS number as the authorized identifier for the federal government.

30. Provide valid requirement on why check is requested? - This is the justification for why a supplier would indicate their payment method is Check
31. Minority Indicator⁵ - (Are you a Minority Owned Business? Yes/No) - **Conditionally Required if supplier indicates they are a Diverse Supplier**
32. Minority Type - (American Indian or Alaska Native, Asian American, Black or African American, Hispanic or Latino, Native Hawaiian or other Pacific Islander) - **Conditionally Required if supplier indicates they are a Diverse Supplier**
33. Supplier Diversity - (Ability to identify as a Diverse supplier, can provide Diversity category and attach a Certificate) - **Conditionally Required if supplier indicates they are a Diverse Supplier**
34. How did you meet the Board? (Advocacy Group, Outreach Event, Other) - **Required**
35. Specify how did you meet the Board? - **Required**
36. Payment Terms- **Required**
37. Pay Group- **Required**
38. PO Method
39. PO Change Method

⁵ The minority indicator, minority type, and supplier diversity information are directed to the contracted entity and not necessarily the individual(s) designated as contacts.