

Drug, Alcohol and Background Screening Toolkit for Southern Company Generation Contractors

This Toolkit describes the background and drug screening process for Contractors serving Southern Company and its affiliates (Company) for generating plants. Screening occurs during the following scenarios:

- Initial (pre-site) drug screen/background investigation
- Reasonable cause alcohol/ drug screen
- Post-accident alcohol/ drug screen
- Random drug screen
- Renewal drug screen

This screening process is in accordance with the Company Standards as outlined in the Southern Company-Contractor contract agreement and shall be followed to the extent applicable by state and federal laws. Generating Plant Access Requirements are also communicated via the Supplier webpage: <https://www.southerncompany.com/content/southern-company/homepage/about-us/suppliers/generating-plant-access-requirements.html>

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Note: If Contractor's services are through a Non-Generation contract, see Toolkit for Southern Company (Attachment III -7).

Account Set-up and Contractor's procedure for initial (pre-site) Drug and Background Screening:

- Southern Company Supply Chain Management or the contract administrator will inform Contractor of the drug and background screening requirements.
- Contractor will select the appropriate provider for the required screenings (page 3). When contacting the Provider, the Contractor shall identify themselves as a Southern Company Contractor and open an account. Contractor is responsible for all costs incurred for the drug screen and background investigation. If reimbursement is available, Contractor will seek this through the appropriate Southern Company contact.
- For drug screening, the provider will give the Contractor an approved list of collectors to use. The provider will also provide any necessary forms and devices needed to conduct the drug screening.
- For background screening, the provider will direct the Contractor to the appropriate platform to request the background investigation.
- The provider will conduct the required drug and/or background screens based on the pre-set Southern Company screening criteria (page 4) and will make an eligibility decision based on Southern Company disqualification standards (page 4). The provider will identify the Contractor's representative as "Compliant" or "Non-Compliant" and will communicate that decision to the Contractor and Southern Company.
- Contractor shall follow Company's Fitness for Duty Procedure for workers taking prescribed medication. This procedure is outlined on the Supplier's webpage.
<https://www.southerncompany.com/content/southern-company/homepage/about-us/suppliers/generating-plant-access-requirements.html> .
- Specific Alere accounts have been set-up for screening for union Boilermakers and Ironworkers. (See FAQ for more information)
- DOT- regulated workers are not required to have drug screens under this program if performing in regulated capacity. Risk evaluation may require background screening.

Contractor's procedure for renewal Drug and/or Background Screening:

- Contractors shall ensure their employees remain compliant with all drug and background screening requirements. A screening provider from the screening provider list (page 3) shall be used and shall follow the same procedure described above.
- Renewal drug screens are required every 12 months.
- Renewal background screens are required every 7 years.

Contractor's procedure for post-accident, or reasonable cause Drug and/ or Alcohol Screening:

- If a post- accident or reasonable cause screen is required, a screening provider from the screening provider list (page 3) shall be used and shall follow the same procedure described above, except in cases of emergency.
- Contractor shall follow the appropriate investigative and reporting procedure in company- Contractor agreement.

Contractor's procedure for random Screening:

- A screening provider from the screening provider list (page 3) shall be used and shall follow the same procedure described above. Random drug screening requirements will be communicated by Supply Chain Management or contract administrator.

List of Screening Providers for Drug, Alcohol Screening & Background Investigations

Program requirements have been established with the following vendors. Contractors must use the vendors below for all required screening. When contacting the vendors, Contractors should identify themselves as a Southern Company Contractor

Drug & Alcohol Screening

Alere Toxicology Services (Abbott)
1-800-433-3823, ext. 68618 (Green Team)

Background Screening

Yale Associates
1-800-536-5772

Drug & Alcohol Screening	Background Screening
<p>Alere Toxicology Services (Abbott) 1-800-433-3823, ext. 68618 (Green Team)</p> <ul style="list-style-type: none"> ➤ Alere Toxicology is the approved provider for all Drug & Alcohol screening for Generation Contractors. 	<p>Yale Associates 1-800-536-5772</p> <ul style="list-style-type: none"> ➤ Yale Associates is the approved provider for Background Screenings. Account set-up may take 5-7 business days.

Please note: Company reserves the right to add or delete screening providers from this list at any time. Company provides this list of designated providers to assist Contractor in selecting a service provider to perform drug /alcohol screening and background investigations for Contractor. While we believe that these firms provide services that are consistent with company's standards, company and its agents do not warrant or guarantee the work, methods, or results of any provider on this list. It is the responsibility of Contractor to conduct its own evaluation of these providers to determine the competence and professionalism of the provider that it ultimately chooses

Drug/Alcohol Screening & Background Investigation Criteria

Drug Screen Criteria*:

Drug screens will be conducted by urinalyses and may be conducted by quick-test (approved POCT device) or traditional lab screening. Quick-tests deliver an immediate result. If the quick-test result is non-negative, it will be sent to the lab for additional screening. Traditional lab screens generally take 2-4 business days for a result. Donors will be screened, at a minimum for cocaine, marijuana, opiates, amphetamines/meth and PCP.

Alcohol Screen Criteria*:

Alcohol screening shall not be conducted for initial (pre-site) screening, but may be appropriate for random, for cause and post-accident situations.

**Post-accident alcohol and drug screening: Follow OSHA regulations to determine drug and alcohol test necessity in post-accident situations.*

Background Investigation Screening Criteria:

Providers have been furnished with Company's specific screening requirements for background investigations, including the following general components:

Criminal history (State and National)	Social Security number verification
Driver's License report	Global Watch (terrorist and blocked parties)
Sex Offender Registry	Federal District criminal history
Additional searches may be requested or added at the request of the Company or Contractor	

Disqualification Standards:

The following criteria may deem worker ineligible for site access:

- Positive (Non-Compliant) drug/alcohol screen, illicit, look-alike or unauthorized prescription medication
- Certain Misdemeanor or Felony Convictions
- Open warrants
- Pending charges that, if resulting in a conviction, would disqualify for one of the preceding reasons
- Currently on probation for charges related to one of the preceding reasons
- Pattern of behavior in the past that may not have resulted in a conviction, but that indicates involvement in criminal activity
- Incident of workplace violence
- Willful omission, misrepresentation, or falsification of personal data provided for background investigation purposes (e.g., omitted criminal conviction, falsification of degree)
- Not authorized to work in the United States
- Currently prohibited from performing work for, or for any Contractor on behalf of, Company or any affiliate
- Suspended or revoked driver's license (for any position that requires driving)
- SSN not found, or SSN belongs to someone else
- Inclusion on blocked persons (terrorist) list

Note: A status of non-compliant is only a denial of access to Southern Company property and is not a recommendation for you to take adverse action against your employee. As the worker's employer, if you independently take adverse action against your employee based on the employee's non-compliant status, it is recommended you seek legal counsel regarding compliance under the Fair Credit Reporting Act.

Frequently Asked Questions:

This document was developed to provide you with answers to the most frequently asked questions we receive during the Contractor background and drug screen process. This is considered a living document and we welcome additional suggestions to improve it.

Q. Are providers listed in this toolkit required?

A. Contractors must use one of the providers listed in the toolkit. These providers have relationships with Southern Company and have been provided the specific directives and criteria required by Southern Company.

Q. If the drug screens are missing from Southern Company's Contractor database, what should the Contractor do?

A. Review the Provider's database and contact the Provider (Page 3) to locate the missing screen.

Q. What circumstances can delay completion of a background investigation?

A. The goal is to complete the background process within 5 business days; however, there are times this is not possible. Several explanations include:

- Jurisdiction requires a clerk assisted search rather than an automated search.
- In some cases, physical documents must be obtained. In some states, this is by written request only.
- A criminal "hit" is identified in the search, however there is no information regarding the final disposition.
- The background investigative report may need to go through a quality review process to determine if additional searches or requests for additional information is needed.

Q. What happens once the screens are complete?

A. Once the screens are complete, the provider will review the results and assign a compliant or non-compliant status in accordance with Southern Company's criteria. The compliance result will be communicated to the Contractor by the Provider through the appropriate database or email system. Results will also be sent and loaded into the Southern Company contract worker database.

Q. What are the MOST and IMPACT programs?

A. Boilermaker MOST and Ironworker IM-PACT programs must be used for union boilermaker and ironworker screenings. Contractors should contact MOST and/or IMPACT to schedule drug screening for these members. MOST and IMPACT will be billed for screening costs. Southern Company will not reimburse Contractors for union boilermaker or ironworker screens.