

Drug Screen and Background Investigation Toolkit for Southern Company Contractors

This toolkit describes the background and drug screening process for contractors/suppliers serving Southern Company and its affiliates (Company). Screening occurs during the following scenarios:

- Initial (pre-site) drug screen/background investigation
- Reasonable cause, post-accident, random, and renewal for backgrounds, drug screens or alcohol screening.

This screening process is in accordance with the Company Standards as outlined in the Southern Company-Contractor contract agreement.

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Note: If Contractor's services are on a Company generating plant site, see Toolkit for Southern Company Generation Contractors. (excluding Supplemental / Leased / Contingent Workers)

Contractor/supplier procedure for initial (pre-site) drug screening and background investigation:

1. Contact your Southern Company project manager (contractor's primary contact at Southern Company) and ask them to complete **Section one** of the Screening Provider's Service Request Form (page 5) in this toolkit.
2. Contractor/supplier should fill out **Section two** of the Screening Provider's Service Request Form (page 5) in this toolkit.
3. Your employee must complete the Consent to Release Information for Drug/Alcohol Screening and/or Background Investigation form (pages 6-7) in this toolkit.
 - **Project Managers/Suppliers: Do not fill out the consent on behalf of your employee.**
4. Select a screening provider from the screening provider list (page 3) in this toolkit.
5. Call the provider and identify yourself as a Southern Company contractor and open an account. You are responsible for all costs incurred for the drug screen and background investigation.
6. Give the screening provider the completed Screening Provider's Service Request form and the completed Consent to Release Information form.
7. 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 your employee as "Compliant" or "Non-Compliant" and will communicate that decision via email to you and the Southern Company project manager. **DO NOT give Southern Company personnel your employee's detailed drug screen results or background report.**

Contractor's procedure for background renewals and post-accident, reasonable cause or random drug/alcohol screening:

You must use a screening provider from the screening provider list (page 3) and should follow the same procedure described above for initial / pre-site screening. Providers have been furnished with requirements for random testing.

Questions? Contact the Supplemental Staffing COE at G2SUPSDBS@southernco.com

List of Screening Provider for Drug/Alcohol Screenings & Background Investigations

Contractor/supplier must use the screening provider listed below.

****Provider can perform drug/alcohol screening and background investigations anywhere in the United States****

Screening Provider for Drug/Alcohol Screenings & Background Investigations

Global HR Research (GHRR) A DISA Company **

2700 Corporate Drive, Suite 100
Birmingham, AL 35242
Phone: 404-551-2422 or 1-866-859-0143
Fax: 1-888-454-7679
Email: southernco@disa.com
www.ghrr.com

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*:

- Standard DOT look-alike panel urine drug test to be conducted for initial (pre-site) screening and may be appropriate for random, for cause and post-accident situations
- ***Alcohol Screen Criteria*:**
- Alcohol screening should 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:

Screening 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
Discretionary background search criteria (as requested by Company or contractor): Education or employment verification, special certification or license verification (example: CDL, TWIC, PHMSA, FAA, PE, JD, CPA, etc.)	

Disqualification Standards:

Company’s screening providers will judge screening results based on the following disqualification standards:

- Positive (Non-Compliant) drug or alcohol screen
- Felony conviction
- Conviction for certain misdemeanors
- DUI/DWI conviction(s) based on position
- 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
- Incident of workplace violence
- Misrepresentation or falsification of personal data provided for background investigation purposes (e.g., 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. For a summary of your rights under the federal Fair Credit Reporting Act (FCRA), go to <https://www.ecfr.gov/current/title-12/chapter-X/part-1022/appendix-Appendix%20K%20to%20Part%201022>

Screening Provider's Service Request Form

Section one - Southern Company project manager completes			
Contract/supplier company name:			Date:
Select Southern Company affiliate:		Does this worker require NERC/CIP access? <input type="checkbox"/> No <input type="checkbox"/> Yes Will this worker drive on public roads on behalf of Southern Company? <input type="checkbox"/> No <input type="checkbox"/> Yes <b style="color: red;">Is this worker assigned to work at Vogtle 3&4? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Project manager (contractor's primary contact at Southern Company):			
Email:		@southernco.com	
Phone:			
Select screen(s) required:		Discretionary screens, certification, verification, special directions or instructions:	
<i>Note: Alcohol screen should only be conducted for random screening, post-accident or for cause situations.</i> Select reason for screen(s):			
		Other explanation:	
PAC Administrator: <i>(check one)</i>			
<input type="checkbox"/>	Alabama Power – Margaret Vinsant mavinsan@southernco.com	<input type="checkbox"/>	Mississippi Power – Andy Hatcher Fax 228-865-5226 lahatche@southernco.com
<input type="checkbox"/>	Southern Company Generation & Southern Power – Roberta Morgan Fax 205-257-7605 rhargrov@southernco.com	<input type="checkbox"/>	Southern Company Services, Southern Linc, Power Secure & Southern Company Gas – Jakia Hardy Fax 404-506-5314 jmhardy@southernco.com
<input type="checkbox"/>	Georgia Power – Keith Metcalf Fax 404-506-6948 g2scsbarweb@southernco.com	<input type="checkbox"/>	Southern Nuclear – Larry Sweeney Fax 205-980-5427 LLSweene@southernco.com

Section two – Contractor/supplier completes		
Contact information for your company		
Contact name: <small>(the person at your company who should receive your employee's screening compliance status)</small>	Title:	Email:
Phone:	Your company Tax/Federal ID# <small>(required)</small>	Fax:
Select provider: <i>(see screening provider list on page 3)</i>		

Contractor provides completed service request form to screening provider

Contract Worker Consent to Release Information for Drug/Alcohol Screening and/or Background Investigation

Type or print legibly and carefully:

Your name (typed or printed)		Other last names used	
Home mailing (Address, City, State, Zip)			
Email address:	Phone no:	Date of birth:	Driver's license number / State:
If applicable: Degree obtained, date, name of college, City/State:			Full Social Security number:
All <u>counties, states & countries</u> you have lived in past 7 years:			
Your current employer:		City and State	
Previous employers for past 5 years. Company name, dates and ph. no:			
1.	2.		
3.	4.		

DISCLOSURE AND CONSENT FORM

I hereby acknowledge and understand that my employer has contracted to perform services for one or more Southern Company subsidiaries, affiliates, business units and/or successors (collectively “the Company”), and that in connection with those services the Company may procure or cause to be procured one or more consumer reports which contain information about me. These consumer reports may contain information about me such as: credit history, Social Security verification, education verification, employment verification, drug and alcohol screenings, criminal records and motor vehicle records, SEC orders and releases and financial sanctions. The Company may obtain these consumer reports directly, or it may obtain them through a consumer reporting agency.

I hereby authorize the Company to procure consumer reports including but not limited to the foregoing categories of information from any consumer reporting agency.

Signature: _____ Date:

Name printed:

Frequently asked questions for contractors

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.

Do I have to use the provider listed in this toolkit or can I use another?

Yes, you must use the provider listed in the toolkit. These providers have had long standing relationships with Southern Company and have been provided the specific directives and criteria required by Southern Company. The provider has been given access to our “contract worker dashboard” to enter your employee’s compliance status once the screens are complete. The employee dashboard is the exclusive tool used by Southern Company to determine your employee’s compliance status and to grant your employee the access they need to perform the contracted work.

My employee was recently screened under our company’s own background and drug screen program. Can we use those screens for Southern Company compliance?

No, your employee must undergo the screens using our provider and our process.

My employee was previously screened under Southern Company. However, they completed the assignment and were assigned elsewhere. Does the employee need to have their screens renewed to return to a SCS assignment? If your employee is returning to Southern Company, has had a break in Southern Company service exceeding 30 days and their previously completed screens are older than 12 months, both a background and drug screen renewal is required.

What do I need to focus on when working in the toolkit?

- Verify you are using the most recent version of the toolkit. Since the toolkit is updated periodically, it’s a good idea to check with your Southern Company project manager to ensure you have the most current version. The providers will not accept outdated versions.
- Section one of the Service Request form must be completed by the Southern Company project manager and Section two should be completed by the person at your company who should receive the compliance results.
- All fields on the forms must be completed.
- No one other than your employee should complete the consent form. Do not complete the consent form on behalf of your employee.

What should I expect when opening an account with the screening provider?

Once you have selected a provider from the list in the toolkit, the provider will forward you a service agreement for signature. Payment is required by credit card each time a screening request is made or as required by provider. The provider may ask your employee to complete additional consent forms and will provide your employee with information regarding their right to file a dispute if any information on the background report is incorrect.

What is the expectation for my employee completing the drug screen process?

The drug screen must be scheduled through the provider. Do not independently send your employee to the local Lab Corp clinic. The provider will schedule your employee at a drug screen clinic near your employee's home or work zip code (which may very well be the local Lab Corp clinic). The provider will forward you or your employee important facts about the drug screen, which includes the location of the clinic and hours of operation. **Your employee must complete the drug screen process within 48 hours of contact from the provider. If your employee misses this deadline, additional or alternate screening may be required.**

What happens after I've submitted the required forms (service request form and consent form) to the background/drug screen provider?

The provider will conduct the background investigation and coordinate the drug screen. Note: The provider does not issue interim updates. The provider will direct requests for additional information to your employee.

What circumstances can delay completion of a background investigation?

The goal is to complete the background process within 10 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.

What happens once the screens are complete?

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 loaded into the Southern Company contract worker dashboard and compliance notifications will be emailed to the Southern Company project manager and the company contact you listed on the Service Request form.

The provider quoted me a price at the onset of the screens; however, once the screens were complete, there was an additional cost. Why? The price quoted for the background is based on a criminal history search using the first and last name of your employee and their residential jurisdiction (state/county). During the background process, a scan is conducted using court records, credit reporting agencies and other entities to determine if your employee has used (or been wrongly assigned) alternate last names or nicknames, or if they have lived or worked in jurisdictions other than the address disclosed on your employee's consent form. Using any additional information developed, the background investigation is conducted, searching criminal history under **all** distinctly different name variations and all additional state/county jurisdictions that were identified. Consequently, court costs increase with each variation searched and the provider must pass that cost on to you.

Is a contract worker required to retake background and/or drug screens if there is a delay in their official start date? For new contract workers, drug screens are valid for 90 days, even if there is a delay in the start date (as long as the delay does not exceed 90 days from the date of the initial screening). If the start date exceeds 90 days, a new drug screen is required.

Please Note: Background screens are valid for 12 months.

Are contract workers required to complete a background and/or drug screen if there is a break in service? Please contact the Supplemental Staffing COE at G2SUPSDBS@southernco.com regarding break in service questions.