

Risk I Drug Screen and Background Investigation Toolkit for Southern Company Generation Contractors

Information for Risk I Drug Screens and Background Investigations:

- The Southern Company affiliate's Contract Administrator (Contractor's Plant Contact) and Supply Chain Management organization will inform the Contractor of the testing requirements** for its employees, representatives and other individuals working at the plant site on their behalf ("Contract Workers"). The Contractor will then be directed to contact the Drug/Alcohol Testing and Background Investigation Provider for Southern Company Generation, which is Kroll.

- **For Initial Account Setup, Ordering Supplies, and Customer Service:**

Kroll
1111 Newton Street
Gretna, LA 70053
800-433-3823 Ext. 8601
Email: krollpsc@kroll.com

- The Provider will provide the Contractor with instructions necessary to open an account with the Provider. Account setup may take up to 10 days, so it is important to establish an account well in advance of needing services performed.
- The Contractor will be responsible for all costs associated with the drug/alcohol tests and/or background investigations of its employees. The Contractor may be reimbursed for any drug/alcohol screenings and/or background investigations that are actually performed by the Provider for Contractor personnel who are classified by the Southern Company affiliate as Risk I with a 15% markup added to these costs. In order to be reimbursed for these services, the Contractor must attach a copy of the invoice from Kroll to the invoice submitted to the Southern Company affiliate. In addition, the Contractor must list charges associated with drug/alcohol testing and background investigation services as a separate line item on the invoice submitted to the Southern Company affiliate.
- The Contractor must use the Provider/Provider's agent for all drug/alcohol testing activities including collection services, laboratory services, and Medical Review Officer services, as well as background investigations and dispute resolution of results and reports.
- The Contractor must ensure that each Contract Worker signs the **Project Security Rules** (a copy of which is an attachment to your contract) as part of the "hire-in" process and prior to undergoing a drug or alcohol test and/or background investigation. A copy of each signed Project Security Rules sheet must be given to the plant Contract Administrator.
- For on-site/jobsite drug screening, the Provider has established relationships with collection/testing service providers that are able to perform "point of collection testing" ("Quick Test") at the jobsite. The Provider will direct the Contractor to the appropriate collection/testing service provider for that area. There is a 10 test minimum for services to be performed at the jobsite and a minimum 72 hour notice is required to avoid higher call out fees. As much advance notice as possible will help to ensure timely service.

- For off-site drug screening, the Provider has established relationships with healthcare/medical facilities within 50 miles of each plant. If a Contractor needs to send their employees to a facility for collection/testing, the Provider will direct the Contractor to the appropriate facility for their location.
- If a “Quick Test” is administered, the Contractor must use the Provider’s (Kroll’s) Quick Test Kit. These kits can be purchased directly from Kroll using the contact information above.
- **The Contractor must have a discussion with their Southern Company affiliate plant contact prior to setting up an account with Kroll to determine 1) whether the plant will be utilizing an on-site testing service provider or whether the contractor should utilize a local testing clinic, and 2) whether the Contractor needs to purchase quick test kits or if the plant will provide the kits.**
- If a standard lab test is administered at a fixed clinic, the collector will provide the appropriate collection device. Keep in mind that standard lab test results may take 2 to 5 days.
- If a background investigation is required, the Provider will direct the Contractor and/or their Contract Workers to a secure website to enter the information needed to conduct the investigation. There is also a fax line available if you are unable to use the secure website.
- Once the drug screen and/or background investigation are completed, the Provider will determine the Contract Worker’s status in accordance with Southern Company criteria, which can be found on page 3 of this document.
- Detailed test results and each Contract Worker’s status will be provided to the Contractor via the Provider’s secure website. The Provider will give the Contractor all information necessary for accessing its database when they establish an account with the Provider.
- If a Contract Worker is removed from the jobsite (or not allowed to come to the jobsite) because of a non-negative “quick test”, the Contractor must fax the Chain of Custody form associated with each such incident (given to you by the Provider) to Generation Compliance at 205-257-7605. **THIS REQUIREMENT ONLY APPLIES TO QUICK TESTS.**

IMPORTANT: The Contractor should not give any Southern Company employee a copy of the detailed drug screen or background investigation reports. If a Southern Company affiliate employee needs the detailed drug screen and/or background report, he/she will obtain this information from the Provider.

Note: If the drug screen and/or background results deem the Contract Worker as “non-compliant” and the Contractor decides to take **any action** against their employee (termination, demotion, etc.), the Contractor should consult with their legal counsel prior to taking any action.

**** Testing requirements will be communicated to the Contractor by the Plant/Contract Administrator and Supply Chain Management, but please note that DOT-regulated workers are NOT required to comply with the drug testing requirements described above.**

Drug Screen Criteria:

	Drug Class	Initial Test Cutoff	Confirmation Test Cutoff
1.	Marijuana (THC metabolite)	50 ng/ml	15 ng/ml
2.	Cocaine metabolite	300 ng/ml	150 ng/ml
3.	Opiates	2000 ng/ml	2000 ng/ml
4.	Phencyclidine (PCP)	25 ng/ml	25 ng/ml
5.	Amphetamine and/or Methamphetamine	1000 ng/ml	500 ng/ml

Alcohol Screen Criteria:Alcohol cut-off levels:

.000 – .019%	Negative (Compliant)
.020 – and above	Positive (Non-Compliant)

Note: Alcohol screening is not applicable to initial/pre-site screening of contract workers. Alcohol screening may be applicable for reasonable cause, post- accident, and random screening programs.

Background Investigation Criteria:

- State criminal history – States of residence for the past 7 years, searching records as many years back as available in those jurisdictions
- Sexual Offender Registry – States of residence for the past 7 years, searching records as many years back as available in those jurisdictions
- Driver’s License report – state where license is currently maintained.
- Social Security number search.
- Global Watch – Special Designated Nationals and Blocked Persons List, or other watch lists in accordance with the Patriot Act.

Discretionary background search criteria (Contractor will be directed by Southern Company)

- Employment verification – two employers, or last 5 years
- Education verification – highest level completed
- Special certifications or licenses (CDL, FAA, etc.)

Disqualification Standards for drug/alcohol screens and background investigations:

- Positive (Non-Compliant) drug or alcohol screen.
- Felony conviction.
- Misdemeanor conviction:
 - Weapons, violence, theft, or drug-related activities in previous five years.
 - Two or more of any misdemeanor conviction in previous seven years.
- DUI convictions – two in past five years.
- Incident of workplace violence.
- Willful omission, misrepresentation, or falsification of personal data provided for background investigation purposes (such as omitted criminal convictions, falsification of degrees).
- Unauthorized to work in the United States of America.
- Pending charges that, if resulted in a conviction, would disqualify the candidate for any of the foregoing reasons.
- Currently on probation for charges related to any of the foregoing behaviors.
- Suspended or revoked driver’s license for any position which requires driving.