

DEPARTMENT OF HEALTH AND HUMAN SERVICES
OFFICE OF DIRECTOR

ACTION REFERRAL

TO <i>Singleton</i>	DATE <i>11-4-14</i>
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DIRECTOR'S USE ONLY	ACTION REQUESTED
1. LOG NUMBER 000111	<input type="checkbox"/> Prepare reply for the Director's signature DATE DUE _____
2. DATE SIGNED BY DIRECTOR <i>Cleared 4/23/15, see attached.</i>	<input checked="" type="checkbox"/> Prepare reply for appropriate signature DATE DUE <i>11-14-14</i>
	<input type="checkbox"/> FOIA DATE DUE _____
	<input type="checkbox"/> Necessary Action

APPROVALS (Only when prepared for director's signature)	APPROVE	* DISAPPROVE (Note reason for disapproval and return to preparer.)	COMMENT
1.			
2.			
3.			
4.			

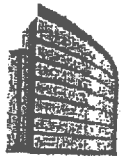
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**MUSC Health**

MEDICAL UNIVERSITY of SOUTH CAROLINA

CENTER FOR DRUG & ALCOHOL
PROGRAMS67 PRESIDENT STREET
CHARLESTON, SC 29425
843/792/5200 PHONE
843/792/5750 FAX**RECEIVED**

NOV 04 2014

Department of Health & Human Services
OFFICE OF THE DIRECTOR**FAX**

To: DIVISION of Appeals From: Sarah BOOL MD
SCDHHS
Fax: 803-255-8206 Pages: 9
Phone: _____ Date: _____
Re: _____ CC: _____

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Comments:

If you have received this communication in error, please immediately notify the MUSC Compliance Office at (843) 792-4037 or the sender at the number indicated on this fax. Thank you.

The documents accompanying this facsimile/electronic transmission contain confidential information intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, and exempt from disclosure. If the reader of this message is not the intended recipient, or an employee responsible for delivering the message to the intended recipient, you are hereby notified that any disclosure, dissemination, distribution, or copying of this communication is strictly prohibited.



Sarah W. Book MD
Associate Professor of Psychiatry and Behavioral Sciences
Medical Director, Center for Drug and Alcohol Programs
Department of Psychiatry and Behavioral Sciences
67 President Street MSC 861
Charleston SC 29425-8610
Tel 843 792 5200
Fax 843 792 5750
booksw@musc.edu
www.muschealth.com/CDAP

Division of Appeals
Department of Health and Human Services
PO Box 8206
Columbia, SC 29202-8206

Tel: 803-898-2600
Fax: 803-255-8206

RE: WellCare Health Plans Incorporated
WellCare of South Carolina, PO Box 31397, Tampa, FL, 33631-3397; 1-888-588-9842

October 29, 2014

To whomever this concerns:

I am writing to register a formal complaint against what I believe is an unethical practice of WellCare Health Plans Inc.

I have previously submitted this complaint to the Office of Consumer Services at the SC Department of Insurance. I will submit with this letter my original complaint, that office's reply (and directions to send this "appeal") as well as WellCare's response to my complaint.

In my clinical practice, I take care of patients who are seeking help with addiction to heroin and pain pills (opioids), also known as Opioid Dependence (ICD 9: 304.00). The current standard of care of these patients includes the use of Medication Assisted Therapy (MAT) with a medication called buprenorphine.

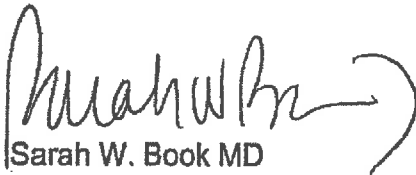
Briefly, Wellcare erroneously led the Office of Consumer Services to understand that their policy to require physicians to submit a buprenorphine taper schedule *at treatment initiation* is the policy of the SCDHHS. They further cite in the attached letter a sentence from the FDA guidelines that suggests that patients who are discontinued from buprenorphine be tapered, rather than discontinued abruptly. However, unlike Wellcare's implication, The FDA does not in any way require that buprenorphine be discontinued at all. In fact, the current recommendation based on the evidence in the medical literature, is that patients are to be continued on MAT indefinitely.

WellCare Health Plans also cites their internal policy "C20RX150" to support their decision. I assure you this policy does not consider any known evidence in the medical literature, nor does it reflect the FDA Guidelines. They suggest in their attached response to the Office of Consumer Services that SCDHHS has approved policy C20RX150 (which includes the requirement that all patients be told a taper schedule to discontinue buprenorphine treatment at treatment initiation).

The need for effective treatments in our state is enormous. South Carolina ranks 10th in the nation in the number of pain medication prescriptions per capita, and the number of deaths in our state attributable to drug overdoses is rising dramatically.

Remarkably, MAT with buprenorphine is effective, safe and well tolerated. It is unethical for WellCare Health Plans, Inc to deny our citizens coverage, based on a policy that is not a reflection of medical evidence.

Sincerely

A handwritten signature in black ink, appearing to read "Sarah W. Book", followed by a large, stylized closing flourish that extends to the right.

Sarah W. Book MD



SOUTH CAROLINA DEPARTMENT OF INSURANCE

Division of Market and Consumer Services
Office of Consumer Services
1201 Main St, Suite 1000
Columbia, South Carolina 29201

Mailing Address:
P.O. Box 100105, Columbia, S.C. 29202-3105
Telephone: (803) 737-6180 or 1-800-768-3467

September 22, 2014

Sarah W. Book, MD
Associate Professor of
Psychiatry and Behavioral Sciences
Medical Director, Center of Drug and Alcohol Programs
Department of Psychiatry and Behavioral Sciences
76 President Street MSC 861
Charleston, SC 29425-8610

In Reply Refer To: 152522
RE: WellCare Health Plans Incorporated

Dear Dr. Book:

I have attached the response from the above company. Based on the information provided, we have determined that the South Carolina Department of Insurance is not the proper regulatory agency to respond. Our Department would only have jurisdiction if your complaint pertained to an insurance policy or the actions of an insurance agent.

According to the company your complaint is with the handling of a claim matter with Medicaid contracted carrier. Medicaid is South Carolina's grant-in-aid program by which the federal and state government share the cost of providing medical care for needy persons who qualify. SC Department of Health and Human Services set the guidelines that this company must meet through a contract agreement. We do not have jurisdiction over another state agency.

After you have reviewed the reply from the company and you still disagree you may pursue this matter further by filing an appeal as shown below. **Provider Appeals should be directed to:**

Division of Appeals
Department of Health and Human Services
P. O. Box 8206
Columbia, South Carolina 29202-8206
(803) 898-2500

We regret that we are unable to provide assistance to you in this situation. We are closing our file since we have no further jurisdiction in this matter. Thank you for the opportunity to serve you.

Respectfully,

Rosa M. Rivers
ROSA M. RIVERS

Senior Insurance Regulatory Analyst
Office of Consumer Services

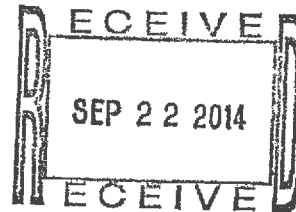
Enclosure



September 19, 2014

South Carolina Department of Insurance
PO Box 100105
1201 Main St., Suite 1000
Columbia, S.C. 29201

RE: 152522



Dear Sir or Madam:

Pursuant to the letter from the South Carolina Department of Insurance to WellCare Health Plans, dated September 16, 2014, WellCare hereby responds to the allegations in said letter.

A request was made to WellCare on Aug. 31, 2014 by Dr. Sarah W. Book for an authorization of the medication Suboxone for a WellCare member. The request was submitted on a required authorization form. The request was designated by Dr. Book as a "New Start" (attached). The request for authorization included the following requirement:

"If new start, a taper schedule showing dose reduction and time frame for tapering is required. If established patient, must submit most current urine drug screen with this request."

The request for authorization also required the following for reauthorization approval:

"Taper trial (documentation of attempts to taper including schedule, dose duration and outcome) is required for reauthorization."

Although Dr. Wood classified her request as a "New Start", the medication history showed the patient had previously been prescribed Suboxone since December, 2013. Dr. Wood's request for authorization also did not include the required urine drug screen for an established patient or documentation of ongoing psychosocial counseling with documentation of compliance along with medical notes regarding a treatment plan and psychosocial counseling.

WellCare denied the authorization request on Aug. 15, 2014 (attached), citing Dr. Wood's failure to provide this information:

- 1.) A copy of urine drug screen; 2.) Documentation of ongoing psychosocial counseling with documentation of compliance along with medical notes regarding a treatment plan and psychosocial counseling; 3.) Statement of taper trial.

The additional information was requested in the denial. The denial also noted the right of the member to appeal and the instructions for filing such an appeal. Neither the member nor Dr. Wood on behalf of the member filed an appeal.



A second request from Dr. Wood was received on Aug. 18, 2014 (attached). Dr. Wood did include the urine drug screen and the medical notes. However, Dr. Wood did not include a taper schedule. The second request was denied on Aug. 19, 2014 (attached) due to not providing a taper schedule. Again the member and Dr. Wood were advised of the right to appeal and instructions for filing an appeal.

WellCare has both corporate (C20RX150) and South Carolina Medicaid (SC22 RX-019) policies and procedures that outline the criteria for prior authorization of medications (see attached). These criteria for Suboxone are set out in the Pharmacy and Therapeutics approved Prior Authorization protocol for Suboxone and the aforementioned policies and procedures ("P&Ps"). The South Carolina P&Ps were approved by the Department of Health and Human Services ("SCDHHS") prior to WellCare's authorization to operate its Medicaid HMO in South Carolina.

In addition, the FDA approved package insert (attached) for Suboxone provides the following guidance:

"2.7 Stopping Treatment.

The decision to discontinue therapy with Suboxone sublingual film after a period of maintenance should be made as part of a comprehensive treatment plan. **TAPER PATIENTS TO AVOID OPIOID WITHDRAWAL SIGNS AND SYMPTOMS."**

Contrary to Dr. Wood's assertions, the FDA approved package insert counsels a tapering process for Suboxone patients. WellCare has included that requirement as part of its policies for reviewing PA requests for Suboxone.

Finally, WellCare included in its denial, notice and instructions whereby the member, or the provider on behalf of the member, could file an appeal of WellCare's denial. Wellcare complied with all requirements of notice required by SCDHHS concerning grievances and appeals. Neither the member nor the provider on behalf of the member filed an appeal of WellCare's denials.

WellCare disputes Dr. Wood's allegation of unethical conduct. WellCare acted according to all appropriate Medicaid policies and procedures, federal guidelines and FDA approved package insert guidance. WellCare complied with its internal policies and procedures and those approved by SCDHHS. At all times during this review process, WellCare complied with the requirements of its license and authorization to operate as a Medicaid HMO.

Since Dr. Wood made no claim for a premium refund or refund of a claim payment, WellCare has not identified an estimate of such premium refund or claims payment.

We hope this response provides a better explanation of the events that happened related to this complaint. Please direct any questions regarding this matter and our response to Bill Prince, Sr. Director Regulatory Affairs, 803-561-4424.



Sincerely,

A handwritten signature in cursive script, appearing to read 'William A. Prince'.

William A. Prince

Sr. Dir. Regulatory Affairs

WellCare of South Carolina, Inc.

NAIC Code: 11775

803-561-4424



Sarah W. Book MD
Associate Professor of Psychiatry and Behavioral Sciences
Medical Director, Center for Drug and Alcohol Programs
Department of Psychiatry and Behavioral Sciences
67 President Street MSC 861
Charleston SC 29425-8610
Tel 843 792 5200
Fax 843 792 5750
booksw@musc.edu
www.muschealth.com/CDAP

Mrs. Cynthia Young
Manager, Office of Consumer Services
South Carolina Department of Insurance
PO Box 100105
Columbia, SC 29202-3105

Tel: 803-737-6180
Fax: 803-737-6231

RE: WellCare Health Plans Incorporated
WellCare of South Carolina, PO Box 31397, Tampa, FL, 33631-3397; 1-888-588-9842

August 29, 2014

Dear Mrs. Young,

I am writing to register a formal complaint against what I believe is an unethical practice of WellCare Health Plans Inc.

In my clinical practice, I take care of patient who are seeking help with addiction to heroin and pain pills (opioids), also known as Opioid Dependence (ICD 9: 304.00). The current standard of care of these patients includes the use of Medication Assisted Therapy (MAT) with a medication called buprenorphine.

Although there is now sufficient evidence in the literature to support medical-decision-making that includes MAT for individuals with opioid dependence *for an indefinite period of time*, WellCare Health Plans Inc will only provide coverage for this medication if the treating physician agrees to a plan of care that includes stopping the medication by way of submitting a taper schedule (including timeframe for tapering), in writing, at treatment initiation.

There is strong evidence in the literature that if the dose of successful MAT is decreased prematurely, or if MAT is discontinued altogether, *patients are at high risk of morbidity and mortality*. Additionally, there is no evidence that patients do well long term when their MAT is decreased prematurely or discontinued altogether. For more information related to this literature, I refer you to a recent review in the New England Journal of Medicine on May 29, 2014 entitled "Medication-Assisted Therapies- Tackling the Opioid-Overdose Epidemic" written by Dr. Nora D. Volkow and colleagues. Dr. Volkow is the Director of the National Institute of Drug Abuse (NIDA) at the National Institute of Health (NIH).

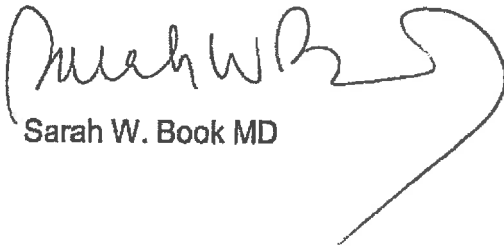
WellCare Health Plans cites their internal policy "C20RX150" to support their decision. I assure you this policy does not consider any known evidence in the medical literature, nor does it reflect the FDA Guidelines.

When I informed "KGilber1" of "Ticket # 96549459", that I could not advise my patients to taper their medication down to MAT-free, as I believe it would result in an increase in morbidity and mortality, and that I had taken the Hippocratic Oath to not knowingly harm my patients, my request to start my patient on buprenorphine was denied.

The need for effective treatments in our state is enormous. South Carolina ranks 10th in the nation in the number of pain medication prescriptions per capita, and the number of deaths in our state attributable to drug overdoses is rising dramatically.

Remarkably, MAT with buprenorphine is effective, safe and well tolerated. It is unethical for WellCare Health Plans, Inc to deny our citizens coverage, based on a policy that is not a reflection of medical evidence.

Sincerely

A handwritten signature in black ink, appearing to read "Sarah W. Book", followed by a long, sweeping horizontal line that extends to the right.

Sarah W. Book MD

Cleared
Spec Attached 4/29/15

To Note and
Store on
11/10/14

RECEIVED

NOV 07 2014

Department of Health & Human Services
Office of Health Programs

DEPARTMENT OF HEALTH AND HUMAN SERVICES
OFFICE OF DIRECTOR

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CENTER FOR DRUG & ALCOHOL
PROGRAMS

67 PRESIDENT STREET
CHARLESTON, SC 29425

843/792/5200 PHONE

843/792/5750 FAX

RECEIVED

NOV 04 2014

Department of Health & Human Services
OFFICE OF THE DIRECTOR

FAX

To: Division of Appeals From: Sarah Book MD
SCDHHS
Fax: 803-255-8206 Pages: 9
Phone: _____ Date: _____
Re: _____ CC: _____

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

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Sarah W. Book MD
Associate Professor of Psychiatry and Behavioral Sciences
Medical Director, Center for Drug and Alcohol Programs
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Division of Appeals
Department of Health and Human Services
PO Box 8206
Columbia, SC 29202-8206

Tel: 803-898-2600
Fax: 803-255-8206

RE: WellCare Health Plans Incorporated
WellCare of South Carolina, PO Box 31397, Tampa, FL, 33631-3397; 1-888-588-9842

October 29, 2014

To whomever this concerns:

I am writing to register a formal complaint against what I believe is an unethical practice of WellCare Health Plans Inc.

I have previously submitted this complaint to the Office of Consumer Services at the SC Department of Insurance. I will submit with this letter my original complaint, that office's reply (and directions to send this "appeal") as well as WellCare's response to my complaint.

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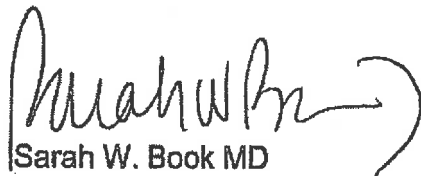
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Sincerely



Sarah W. Book MD



SOUTH CAROLINA DEPARTMENT OF INSURANCE

Division of Market and Consumer Services
Office of Consumer Services
1201 Main St, Suite 1000
Columbia, South Carolina 29201

Mailing Address:

P.O. Box 100105, Columbia, S.C. 29202-3105
Telephone: (803) 737-6180 or 1-800-768-3467

September 22, 2014

Sarah W. Book, MD
Associate Professor of
Psychiatry and Behavioral Sciences
Medical Director, Center of Drug and Alcohol Programs
Department of Psychiatry and Behavioral Sciences
76 President Street MSC 861
Charleston, SC 29425-8610

In Reply Refer To: 152522
RE: WellCare Health Plans Incorporated

Dear Dr. Book:

I have attached the response from the above company. Based on the information provided, we have determined that the South Carolina Department of Insurance is not the proper regulatory agency to respond. Our Department would only have jurisdiction if your complaint pertained to an insurance policy or the actions of an insurance agent.

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Respectfully,


ROSA M. RIVERS

Senior Insurance Regulatory Analyst
Office of Consumer Services

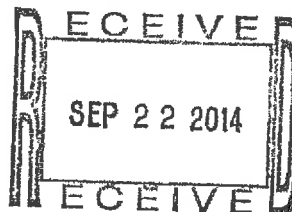
Enclosure



September 19, 2014

South Carolina Department of Insurance
PO Box 100105
1201 Main St., Suite 1000
Columbia, S.C. 29201

RE: 152522



Dear Sir or Madam:

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A request was made to WellCare on Aug. 31, 2014 by Dr. Sarah W. Book for an authorization of the medication Suboxone for a WellCare member. The request was submitted on a required authorization form. The request was designated by Dr. Book as a "New Start" (attached). The request for authorization included the following requirement:

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The request for authorization also required the following for reauthorization approval:

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- 1.) A copy of urine drug screen; 2.) Documentation of ongoing psychosocial counseling with documentation of compliance along with medical notes regarding a treatment plan and psychosocial counseling; 3.) Statement of taper trial.

The additional information was requested in the denial. The denial also noted the right of the member to appeal and the instructions for filing such an appeal. Neither the member nor Dr. Wood on behalf of the member filed an appeal.



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In addition, the FDA approved package insert (attached) for Suboxone provides the following guidance:

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WellCare disputes Dr. Wood's allegation of unethical conduct. WellCare acted according to all appropriate Medicaid policies and procedures, federal guidelines and FDA approved package insert guidance. WellCare complied with its internal policies and procedures and those approved by SCDHHS. At all times during this review process, WellCare complied with the requirements of its license and authorization to operate as a Medicaid HMO.

Since Dr. Wood made no claim for a premium refund or refund of a claim payment, WellCare has not identified an estimate of such premium refund or claims payment.

We hope this response provides a better explanation of the events that happened related to this complaint. Please direct any questions regarding this matter and our response to Bill Prince, Sr. Director Regulatory Affairs, 803-561-4424.



Sincerely,

A handwritten signature in black ink, appearing to read 'William A. Prince'.

William A. Prince

Sr. Dir. Regulatory Affairs

WellCare of South Carolina, Inc.

NAIC Code: 11775

803-561-4424



Sarah W. Book MD
Associate Professor of Psychiatry and Behavioral Sciences
Medical Director, Center for Drug and Alcohol Programs
Department of Psychiatry and Behavioral Sciences
67 President Street MSC 861
Charleston SC 29425-8610
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Mrs. Cynthia Young
Manager, Office of Consumer Services
South Carolina Department of Insurance
PO Box 100105
Columbia, SC 29202-3105

Tel: 803-737-6180
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RE: WellCare Health Plans Incorporated
WellCare of South Carolina, PO Box 31397, Tampa, FL, 33631-3397; 1-888-588-9842

August 29, 2014

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Although there is now sufficient evidence in the literature to support medical-decision-making that includes MAT for individuals with opioid dependence *for an indefinite period of time*, WellCare Health Plans Inc will only provide coverage for this medication if the treating physician agrees to a plan of care that includes stopping the medication by way of submitting a taper schedule (including timeframe for tapering), in writing, at treatment initiation.

There is strong evidence in the literature that if the dose of successful MAT is decreased prematurely, or if MAT is discontinued altogether, *patients are at high risk of morbidity and mortality*. Additionally, there is no evidence that patients do well long term when their MAT is decreased prematurely or discontinued altogether. For more information related to this literature, I refer you to a recent review in the New England Journal of Medicine on May 29, 2014 entitled "Medication-Assisted Therapies- Tackling the Opioid-Overdose Epidemic" written by Dr. Nora D. Volkow and colleagues. Dr. Volkow is the Director of the National Institute of Drug Abuse (NIDA) at the National Institute of Health (NIH).

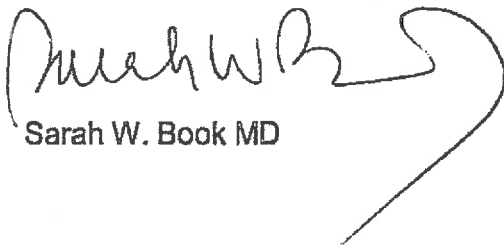
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When I informed "KGilber1" of "Ticket # 96549459", that I could not advise my patients to taper their medication down to MAT-free, as I believe it would result in an increase in morbidity and mortality, and that I had taken the Hippocratic Oath to not knowingly harm my patients, my request to start my patient on buprenorphine was denied.

The need for effective treatments in our state is enormous. South Carolina ranks 10th in the nation in the number of pain medication prescriptions per capita, and the number of deaths in our state attributable to drug overdoses is rising dramatically.

Remarkably, MAT with buprenorphine is effective, safe and well tolerated. It is unethical for WellCare Health Plans, Inc to deny our citizens coverage, based on a policy that is not a reflection of medical evidence.

Sincerely

A handwritten signature in black ink, appearing to read "Sarah W. Book", followed by a long, sweeping horizontal line that extends to the right.

Sarah W. Book MD

April 29, 2015

Sarah W. Book MD
Associate Professor & Medical Director
Department of Psychiatry and Behavioral Sciences
67 President Street, MSC 861
Charleston, SC 29425-8610

Re: Request to file a formal complaint WellCare Health Plans Incorporated

Dear Dr. Book:

This letter serves as a response to the November 4, 2014 letter and email submitted to the South Carolina Department of Health and Human Services (SCDHHS; *heretofore referred to as "Department"*) regarding a request to register a formal complaint against WellCare Health Plans, Inc. (*heretofore referred to as "WellCare"*) for the denial of the medication request for a WellCare member—that being Saboxone. The Department's responses to both requests are provided below.

In accordance with Sections 4, 8 and 9 of the Department's 2014 MCO Contract, the Prescription Drug Section of the July 1, 2014 Policy and Procedure Guide/Manual for Managed Care Organizations (*aka* "MCO P&P"), and the Code of Federal Regulations (CFR): 42 CFR § 456... These documents stipulate the following:

- The Federal Medicaid Program grants State Medicaid Programs the authority to provide prescription drug coverage benefits through a Managed Care Program. WellCare is an approved South Carolina Medicaid Managed Care Health Plan.
- Consistent with the guidelines set forth in the Department's Medicaid Managed Care Program, WellCare is required to establish and implement a prescription drug benefit program, utilization management (UM) program and appeal, grievance and dispute program.

Prescription Drug Program

- The Prescription Drug Program requires a MCO-specific preferred drug list (PDL).



- This program should encourage the use of the most cost-effective medication within a drug class and provide prescription drug coverage according to the Medicaid MCO Member's needs.
- All PDLs undergo a review by the Pharmacy & Therapeutics (P&T) Committee prior to implementation.
- Importantly, although WellCare may employ a PDL and other mechanisms to promote cost-effective, clinically appropriate medication utilization, all FDA-approved medications must ultimately be covered except: for those listed in the most recent publication of the MCO P&P.
- Information regarding coverage allowance for a non-formulary product shall be disseminated to Medicaid Managed Care Members in the Medicaid Managed Care Member's Handbook and to providers in the CONTRACTOR's Provider Manual.

Utilization Management (UM) Program

- As stipulated within the Department's Medicaid Managed Care Program (i.e., Section 8 of the 2014 MCO Contract), all MCOs shall develop and maintain policies and procedures with defined structures and processes for a Utilization Management (UM) program that incorporates Utilization Review and Service Authorization.

Member Grievance/Appeal & Provider Dispute Program

- As stipulated within the Department's Medicaid Managed Care Program (i.e., Section 9, WellCare is required to establish a Provider Dispute System for in-network and out-of-network providers to dispute the its policies, procedures, or any aspect of its administrative functions. This System must include the following:
 - Written policies and procedures that describes, in detail, the operation of the Provider Appeal System. Specifically:
 - A description of how a provider may file an appeal with WellCare for issues that are to be addressed by the Provider Dispute System and under what circumstances a provider may file a Member Appeal directly to the Department for those decisions that are not a unique function of the MCO.
 - A description of how the MCO's provider relations staff are trained to distinguish between a provider dispute and a Medicaid Managed Care Member grievance or appeal for which the provider is acting on the Medicaid Managed Care Member's behalf.

Thank you for bringing your concerns to our attention and for the continued participation in the South Carolina Healthy Connections Medicaid Program. If you have additional questions or comments regarding the Medicaid Program's services and/or policies, please contact us by phone at (803) 898-4614 or by email at healthservices@scdhhs.gov.

A handwritten signature in black ink, appearing to read "Nathaniel J. Patterson". The signature is fluid and cursive, with the first name "Nathaniel" and last name "Patterson" clearly distinguishable.

Nathaniel J. Patterson
Program Director, Health Services

cc: Deirdra T. Singleton, Deputy Director
Stephen Boucher, Operations Director
Bryan Amick, Pharmacy Director
Evan Gessner, Assistant General Counsel
Cynthia Gore, Executive Assistant
Courtney Sanders, Administrative Assistant