

RECEIVED JUL 20 2004

BEFORE THE WEST VIRGINIA BOARD OF SOCIAL WORK EXAMINERS

RECEIVED JUL 20 2004

WEST VIRGINIA BOARD OF SOCIAL  
WORK EXAMINERS,

RECEIVED JUL 20 2004

Complainant,

v.

Case No. 0204-0406

BARBARA ANDREADIS,  
License Number: DP00941640

Respondent.

---

**CONSENT AGREEMENT AND ORDER**

---

After due investigation of a formal complaint, the West Virginia Board of Social Work Examiners (hereinafter "Board") determined that there was probable cause to believe that Barbara Andreadis ( hereinafter referenced as the "Respondent") was guilty of unprofessional and unethical conduct in the practice of social work, in violation of the provisions of *West Virginia Code* §§ 30-30-1 *et seq.* and the Rules of the Board, 25 CSR 1, §§ 25-1-1 *et seq.* The Respondent was provided with written notice of the allegations against her and, pursuant to the rules of the Board, the Respondent has been given the opportunity for a hearing or, in the alternative, to enter into an agreement for the resolution of the complaint and allegations against her.

The Respondent, after being informed of her rights, has chosen to proceed without a hearing and to have the matter resolved by entry of the following Order in disposition of this matter.

## FINDINGS OF FACT

The West Virginia Board of Social Work Examiners makes the following findings:

1. The Board is created for the purpose of regulating the social work profession in the State of West Virginia. *W. Va. Code* § 30-30-1.
2. The Respondent, Barbara Andreadis, is a licensee of the Board, having been issued License No. DP00941640, and is therefore subject to the license requirements of said Board.
3. The Board is empowered to suspend, revoke or otherwise discipline an individual's social work license under the authority granted to it by *W. Va. Code* § 30-30-7 and §30-30-8.
4. The Respondent, Barbara Andreadis, has been convicted of two criminal offenses in the State of Maryland - the felony offenses of Medicaid Fraud and Insurance Fraud - in connection with her practice as a social worker. She pled guilty to these offenses on the 20th day of May, 2003, in the Circuit Court of Maryland for Washington County, Maryland, and was subsequently sentenced by that court for these crimes.
5. Conviction of a felony is grounds for the suspension or revocation of a license issued by the Board under the provisions of *West Virginia Code* §30-30-8(a)(1).
6. In the years 1999, 2000 and 2001, the Respondent, Barbara Andreadis submitted claims for payment to the Maryland Medical Assistance Program, falsely representing that she had provided services to qualified recipients of the program when she knew that such services were not provided, and falsely representing that services were provided to recipients who met the requirements for reimbursement for Medical Assistance when she knew that such services did not qualify for reimbursement. As a result of her false statements and representations, the Respondent fraudulently obtained \$145,000 from the State of Maryland and deprived the Maryland Department of Health and Mental Hygiene of the use of these funds to serve qualified clients of the Maryland Medical Assistance program.

7. The Board has adopted the National Association of Social Workers' Code of Ethics, effective January 1, 1997, as its Code of Ethics and has defined professional misconduct to include a social worker's failure to comply with the Code of Ethics of the National Association of Social Workers. Code of State Rules §§ 25-1-4 and 25-1-10.1.8.

8. Section 4.04 of the Ethical Standards of the *Code of Ethics* of the National Association of Social Workers requires that a social worker not participate in or be associated with dishonesty, fraud and deception.

9. Section 3.05 of the Ethical Standards of the *Code of Ethics* of the National Association of Social Workers requires that a social worker establish and maintain billing practices that accurately reflect the nature and extent of the professional services provided by the social worker.

### **CONCLUSIONS OF LAW**

1. As shown by the Respondent's pleas of guilty to, and convictions for, two felony offenses within the last five years, the Respondent, Barbara Andreadis, has engaged in unprofessional conduct that constitutes grounds for the suspension or revocation of her license, as provided under *West Virginia Code* §30-30-7(a).

2. The Respondent, in violating the requirements of the National Association of Social Workers' Code of Ethics described above, has exhibited unprofessional and unethical conduct as defined by the Rules promulgated by the Board and the Respondent is guilty of unprofessional and unethical conduct in the practice of social work. These acts are grounds for the suspension or revocation of the Respondent's license under *W. Va. Code* §§ 30-30-7(a)(3) and (6).

## CONSENT OF LICENSEE

I, Barbara Andreadis, have read this document and, by signing my name to it, I acknowledge the following:

1. I have not chosen to retain legal counsel, but I have been informed of my right to consult an attorney and have been advised that this Agreement will affect my substantial legal rights.

2. I have received proper and sufficient notice of the charges against me in this proceeding.

3. I am fully aware that, before any disciplinary action can be taken against my license, I have a right to a formal hearing and, that if I assert my right to a hearing, I would have the following rights and protections:

- a. The Board would have the burden to prove the allegations stated in the Complaint by a preponderance of evidence;
- b. I would have the right to be represented by my own counsel throughout the proceeding;
- c. I would have the right to cross-examine any witnesses who may testify against me;
- d. Though I am not obligated to present evidence or prove any facts, I would have the right to present evidence in my defense. I would be able to compel the production of documents and to subpoena witnesses. I could also testify in my own behalf, if I so chose; and
- e. If, after a hearing, the Board would rule against me, I would have the right to have this decision reviewed by a Circuit Court.

4. I am aware that, by waiving my right to a hearing and consenting to the entry of this order, I am giving up all of the rights listed above.

5. I understand that the West Virginia Board of Social Work Examiners is bound by agreement and by law to report the results of all disciplinary actions for posting in the Health Integrity Practitioners Data Bank through the Association of Social Work Boards. I specifically acknowledge that the Board's decision and action in my case will be reported to this national database.

6. I voluntarily waive my right to a hearing on the allegations contained in the Complaint against me.

7. I admit that I have exhibited unprofessional and unethical conduct in the practice of social work and I have violated the Rules of the Board.

8. I consent to the entry of this order and I agree to the terms set out below.

9. I willingly surrendered my West Virginia License. SA 7/18/04  
**TERMS OF ORDER**

1. The West Virginia Board of Social Work Examiners hereby REVOKES the license, previously granted to Barbara Andreadis, to practice social work in the State of West Virginia. The Board will not reinstate this license or grant a new license to Barbara Andreadis for a period of five (5) years following the date of her convictions in the Circuit Court of Maryland.

~~I surrendered my license. I did not cause any investigations. I cannot pay any fees (see attached letter).  
2. The Respondent is hereby ORDERED to reimburse the Board for its administrative and legal expenses incurred in the course of investigating and bringing this case to resolution before the Board and must complete this reimbursement for all expenses before making any future application for licensure by this Board.~~ SA 7/18/04

I will NOT be seeking ANY future WVA license  
3. If the Board grants a new license to Barbara Andreadis, the Board may impose reasonable terms, conditions or limitations on the license for the protection of the SA 7/18/04

public. The Board reserves the right and authority to determine the complete terms of such probation at the time of issuance of the license and these terms or conditions may include, but not necessarily limited to, counseling, therapy, additional education or contact hours for training in professional ethics.

So ORDERED this 26<sup>th</sup> day of July, 2004.

WEST VIRGINIA BOARD OF SOCIAL WORK EXAMINERS

by: Rita M. Brown  
Chairperson, RITA BROWN

RESPONDENT'S ACKNOWLEDGMENT

I have read the terms of this Consent Order and Agreement, and I consent to the entry of this Order and its terms. which include my handwritten comments and items listed on the attached memo.

Signed: Barbara J. Andreanakis

Date: 7/18/04.