



## Anne D. Cartwright

### PARTNER

THE LINK VIRTUAL

OFFICE

PHONE: 816.983.8351

EMAIL: ANNE.CARTWRIGHT@HUSCHBLACKWELL.COM

KANSAS CITY, MO\*

PHONE:

816.983.8000

### OVERVIEW

## Annie shares a commitment to the educational mission with clients and colleagues.

As an education lawyer, Annie works with institutions ranging from small nursing colleges to national research universities and K-12 schools. She serves as primary outside counsel to many clients and also offers a range of in-depth education regulatory advising.

Institutions with and without in-house counsel call Annie to handle specialized and emerging issues, support complex matters, manage emergencies, and provide objective, proactive outside assessments. Her work includes legal compliance audits, policy development, investigations, and customized training. Annie also helps institutions respond to regulatory investigations and actions (including U.S. Department of Education program reviews), resolve disputes, and proceed through litigation when needed. Annie regularly works with colleges, universities, healthcare systems, and other entities managing the web of legal and regulatory requirements related to merger and acquisition transactions involving education programs. As a member of the firm's AI team, Annie also engages with educational institutions on issues related to artificial intelligence and its implications.

Annie takes a special interest in issues linked to student funding and those unique to academic medical centers. To help colleges and universities maintain the flow of funding that fuels their operations, she focuses much of her practice on Title IV Federal Student Aid, scholarships, student loans, and other student finance programs. Annie extends her practice to other issues linked to Title IV Federal Student Aid and other government student funding,

### Industries

Education  
Healthcare

### Services

Academic Medicine  
Artificial Intelligence  
Healthcare Providers  
Higher Education  
K-12 Education  
Title IX

including Title IX, disability and other nondiscrimination, Clery Act and student safety, privacy, contract, employment/tenure, institutional governance, changes of control, and accreditation concerns. In addition, Annie concentrates on issues unique to academic medical centers, providing resources on learner and healthcare concerns arising in healthcare education programs—such as residency programs, clinical rotations, research considerations, and issues that intersect education and healthcare environments (such as privacy and vaccination considerations). She seeks to deliver positive outcomes that align with each institution's culture, values, and mission.

### Featured Experience

#### **An Ounce of Prevention: Tending to Policy & Practice Review**

After discovering liability patterns sprouting from neglected or outdated college and university policies and systems, Annie and the Education team developed a legal compliance policy audit process to help schools break common risk-generating cycles. Working with a large university, Annie used one such audit to review policies associated with common and significant risks—including nondiscrimination procedures, required disclosures, privacy protections and Clery Act Annual Security Reports. By using audit reports including detailed action plans, she provided administrators with a road map to enhanced compliance.

### Experience

#### **TITLE IV FEDERAL STUDENT AID**

- Guided institution of higher education through response to significant preliminary compliance findings by U.S. Department of Education (USED), coordinating education team in internal inquiries; assisting with institutional system and policy development; and preparing written submissions to USED demonstrating that institution remediated findings and resolved concerns. USED's final determination accepted institution's response and resolution efforts, issuing limited final findings.
- Prepared colleges and universities for imminent USED Federal Student Aid program reviews, leading team in updating outdated policies, developing procedural enhancements, spot-checking student files, and staff preparation. Result was ready-to-go action plans for improved compliance available for USED review upon site visit.
- Counseled institutions on applying USED still-developing data privacy, breach and disclosure reporting requirements concerning Federal Student Aid information.

## Experience

- Assisted institutions in developing institutional loan and student account payment programs compliant with student finance, Truth in Lending Act, and state consumer finance law requirements.
- Conducted reviews at colleges and universities of high-risk Title IV compliance areas, including returns of Title IV funds, satisfactory academic progress and distance education concerns. Developed detailed plans for enhancing institutional compliance and mitigating risks.
- Guided multiple institutions—including schools affiliated with healthcare entities in complex healthcare transactions—through change of control merger/acquisition processes including in interactions with, and compliance with the requirements of, accreditors and USED.
- Guided large proprietary university through Gainful Employment Alternate Earnings Appeal, including implementation of alumni survey, obtaining USED clarification and successful submission of appeal under shifting Department expectations.
- Represented private faith-based liberal arts college during USED Title IV program review, reducing potential noncompliance liabilities from +\$6 million to less than \$4,000 through file review and analysis, demonstrating compliance to support reduction.

## ACADEMIC MEDICAL PROGRAMS

- Conducted investigations of alleged bullying and discrimination misconduct by principal investigators at academic medical centers.
- Guided multiple nursing and health sciences institutions in preparing for merger of their parent health system that amounted to a change in ownership under U.S. Department of Education, accreditor, state, and other regulatory agency requirements, assisting health systems in understanding requisite timelines, financial commitments, and relevant merger and shared service agreement terms.
- Led hospital inquiry related to medical resident resignations to ensure compliance with legal and accreditation requirements and support effective residency program operations.

## Experience

- Assisted academic medical centers and other institutions in analyzing risks and intersecting and emerging legal, nondiscrimination and agency requirements surrounding COVID-19 vaccinations for employees and students in education programs.
- Partnered with members of Husch Blackwell's Healthcare team to ensure optimal structure for residency and fellowship programs, ensuring compliance with Accreditation Council for Graduate Medical Education (ACGME) and healthcare regulatory requirements.

## COMPLIANCE AND TRAINING

- Developed and presented training for numerous college and university administrators and employees, including general back-to-school legal updates and customized advanced Title IX coordinator, investigator and adjudicator workshops.
- Served as outside investigator for schools and universities, providing independent analysis of sexual misconduct complaints raised under Title IX policies.
- Conducted in-depth legal compliance audits of educational institutions' key policies and procedures, nondiscrimination systems and operational functions to improve compliance and align with legal and risk-management best practices.
- Worked with numerous institutions in addressing issues around foreign gift and contract reporting under Section 117 of the Higher Education Act, including reporting responsibilities and interpretation of USED demands for information.

## CRISIS MANAGEMENT

- As key member of the firm's COVID-19 resource team, advised clients on accessing pandemic-driven financial assistance—including Paycheck Protection Program (PPP) and Higher Education Emergency Relief Fund (HEERF) compliance—and vaccination considerations.

## Experience

### OUTSIDE GENERAL COUNSEL

- Provided "first phone call" responses to K-12 schools, colleges and universities, guiding them through legal, policy and procedure considerations related to situations presenting potential nondiscrimination, student disability accommodation, governance, contract review, financial aid and employment issues.
- Served as touchpoint for college and university boards conducting institutional presidents' evaluations and setting strategic goals.
- Guided schools through measured approaches to concerning student conduct—including use of social media and escalating threats—and resulting discipline, all while balancing potential disability, other discrimination, privacy, speech and other legal considerations.

## Education

- J.D., Loyola University Chicago School of Law
  - American Jurisprudence Awards: Legal Writing, Appellate Advocacy
  - National Moot Court Team
- B.A., Lake Forest College
  - Politics and French
  - Kappa Alpha Theta Sorority

## Admissions

- Missouri
- Illinois
- Kansas
- U.S. District Court, Northern District of Illinois
- U.S. District Court, Western District of Missouri

## Clerkships

- The Hon. Nanette K. Laughrey, U.S. District Court, Western District of Missouri
- The Hon. Charles R. Norgle Sr., U.S. District Court, Northern District of Illinois

## Community Leadership

Annie actively contributes to education law thought leadership through her committee membership with the National Association of College and University Attorneys. Through participation in National Association of Student Financial Aid Advisors activities, Annie has advocated for improved transparency, access, affordability and accountability in education regulation and systems through policy initiatives aimed at proposing national legislation.

Her pro bono efforts include providing counsel to a nonprofit that partners with elementary schools to pair professionals and elementary school children for online and in-person one-on-one reading sessions.

As a volunteer with Court Appointed Special Advocates, Annie supports court-appointed volunteer advocacy for children and youth who have experienced abuse or neglect.

---

\*Contact Anne to set up an in-person consultation by appointment in the Kansas City office.



Academic Medical Centers