



Aaron Lacey

Partner

St. Louis
314 552 6405 direct
314 552 7000 fax
alacey@thompsoncoburn.com

EDUCATION

- Vanderbilt University Law School, J.D. and Certificate in Law and Business, 2002
- Duke University, B.A., 1999

ADMISSIONS

- District of Columbia
- Missouri
- Virginia
- Virginia USDC, Eastern District

AFFILIATIONS

- National Association of College and University Attorneys
- American Bar Association

EMPLOYMENT

- Thompson Coburn LLP Partner, 2014-Present
- Vatterott Educational Centers, Inc. Senior Vice President of Regulatory Affairs and Strategic Development, 2010-2014
- Dow Lohnes PLLC (now Cooley LLP) Attorney, Postsecondary Education Practice Group, 2002-2010

Aaron's practice is dedicated entirely to helping institutions of higher education navigate complex legal and regulatory matters.

With time served both as outside and in-house counsel, Aaron has substantive experience in the array of federal, state, and accrediting agency laws and standards that govern postsecondary institutions, and is a frequent writer and speaker on topics relating to higher education policy and the federal financial aid programs. He also is the editorial director of REGucation, the firm's higher education law and policy blog, and host of the firm's Higher Education Webinar Series.

In October 2017, Aaron was selected by the U.S. Department of Education to serve as one of 17 negotiators charged with overhauling the Department's complex and controversial "borrower defense" rule. The Department selected Aaron to represent and negotiate on behalf of general counsels, attorneys and compliance officers at postsecondary institutions nationwide.

Aaron regularly represents institutions in administrative proceedings before state licensing entities, accrediting agencies, and the U.S. Department of Education, including matters arising from audits, program reviews, and investigations of the Office of Inspector General.

In support of institutional initiatives, he assists clients in drafting and negotiating a wide variety of agreements, including domestic and international articulation, consortium, licensing, marketing, and agency contracts, and in the case of postsecondary mergers and acquisitions, stock and asset purchase agreements. Aaron also assists with the management of regulatory and government agency relationships, policy creation and implementation, strategic planning, and compliance systems design.

Aaron previously served for four years as Senior Vice President of Regulatory Affairs and Strategic Development for a multi-campus, postsecondary institution, where he managed regulatory and government affairs for the institution's 24 campus locations and its online division, as well as aspects of the institution's public relations and strategic development efforts. Prior to going in-house, Aaron served for nearly eight years in the higher education practice of a prominent Washington, D.C., law firm.

Aaron is a member of the National Association of College and University

Attorneys and of the American Bar Association.

Publications

- Panelist, "*The Latest in Federal Policy*," *University Professional & Continuing Education Association – Annual Conference* March 2018
- Presenter, "*Managing ADA Accommodations in the Clinical Setting*," *National Conference on Allied Health Education* March 2018
- Presenter, "*An Update on the Rewrite of the Federal ‘Borrower Defense’ Rule*," *National Association of State Administrators and Supervisors of Private Schools – Webinar* March 2018
- Presenter, "*Consumer Information Boot Camp and What’s Next for USED’s Borrower Defense Rule*," *Missouri Association of Student Financial Aid Personnel - Annual Conference* November 2017
- "How to Project Gainful Employment Rates," *Thompson Coburn Desk Guide*, March 2016
- Co-Author, "The Nuts and Bolts of Reauthorization," *Career Education Review*, October 2015
- Co-Author, "Rethinking the Regulatory Environment of Competency-Based Education," *American Enterprise Institute’s Center on Higher Education Reform*, May 2015

Presentations

- Presenter, "The State of Gainful Employment: Current and Future Challenges for Schools"; *National Association of State Administrators and Supervisors of Private Schools – Annual Conference*, April 2017
- Panelist, "Regulatory and Compliance Aspects of International Online and Continuing Education"; *University Professional & Continuing Education Association*, February 2017
- Co-Presenter, "FSA: The New Audit Guide"; *New York State Financial Aid Administrators Association*, January 2017
- Presenter, "Hot Topics in Higher Education"; *Louisiana Association of Private Colleges and Schools Executive Management Meeting*, January 2017
- Presenter, "USED Program Review Preparation and Unwrapping the Borrower Defense Rule"; *Missouri Association of Student Financial Aid Personnel - Annual Conference*, December 2016
- Presenter, "The Borrower Defense Final Rules"; *New York State Financial Aid Administrators Association – 48th Annual Conference*, November 2016
- Presenter, "Gainful Employment: Preparing for the Next Six Months"; *Kansas Board of Regents – Annual State Meeting*, October 2016
- Presenter, "Structuring International Recruiting and Marketing Arrangements and Gainful Employment: Effectively Challenging Debt-

- to-Earnings Rates"; Association of Private Sector Colleges and Universities - Annual Conference, June 2016
- Co-Presenter, "Federal Perspectives in Higher Education"; United States Distance Learning Association National Conference, May 2016
 - Presenter, "ADA Title III Fundamentals"; Commercial Vehicle Trade Association - Fall Conference, October 2015
 - Panelist, "The Promise (and Perils) of Competency-Based Education"; Roundtable Webinar Series Presented by University Professional & Continuing Education Association and Penn State University, September 2015
 - Presenter, "Paper Nirvana: Crafting Enrollment Documentation that's Great for Students and Schools Alike"; Association of Private Sector Colleges and Universities - Webinar, August 2015
 - Co-Presenter, "Competency-Based Education: The Path to Program Approval"; Association of Private Sector Colleges and Universities - Annual Conference, June 2015
 - Presenter, "Managing Crime, Security, and Allegations of Sexual Misconduct on the Christian Campus"; Council for Christian Colleges and Universities - 39th Annual President's Conference, January 2015
 - Co-Presenter, "Rightsizing the Right Way Restructuring and Realignment in Higher Education"; Webinar, September 2014