

DEBRA A. GEROUX

SHAREHOLDER

Troy
248 258 2603
geroux@butzel.com



Debra A. Geroux is a Shareholder practicing in the firm's Troy office, where she is a Co-Chair of the firm's Health Care Industry Team. She is also a member of the firm's Cybersecurity and Privacy Specialty Team, Government & Internal Investigations Team, and Litigation and Dispute Resolution Team.

Debra A. Geroux is a Shareholder practicing in the firm's Troy office, where she is a Co-Chair of the firm's Health Care Industry Team. She is also a member of the firm's Cybersecurity and Privacy Specialty Team, Government & Internal Investigations Team, and Litigation and Dispute Resolution Team. She is a graduate of Michigan State University College of Law, (J.D., *cum laude*, 1995), where she was a member and managing editor of the Law Review. She received her Bachelor of Science from Michigan State University in 1988.

HEALTH CARE PRACTICE

Ms. Geroux's healthcare practice focuses on health care compliance, cybersecurity and privacy, and statutory reporting obligations. She has assisted health care practitioners in defense of state and federal debarment, fraud, waste and abuse investigations and litigation, licensing and credentialing, government and commercial payor audits and a host of other health care issues. She also has extensive experience in Supply Chain and source contracting for a large Michigan-based health system, including negotiations of its IT contracts. In September 2018, Ms. Geroux earned her Certified in Healthcare Privacy Compliance (CHPC) designation from the Compliance and Certification Board. She also holds a Certified in Healthcare Compliance (CHC) designation, which she received in November 2012. Ms. Geroux's representative clients include individual

Primary Practice Areas

Cybersecurity and Privacy
Specialty Team
Governmental
Health Care
Health Care Industry Team

All Related Practice Areas

Cybersecurity and Privacy
Specialty Team
E-Discovery Specialty Team
Emerging Technology Specialty
Team
Finance & Restructuring
Government & Internal
Investigations
Governmental
Health Care
Health Care Industry Team
HIPAA
Litigation and Dispute
Resolution
Professional Liability/
Disciplinary Proceedings
Stark, Fraud & Abuse
Telemedicine & E-Health
Tribal Law Specialty Team
White Collar Crime &

DEBRA A. GEROUX

practitioners and group practices, hospitals, community mental health authorities, home health agencies, pharmacies and pharmaceutical manufactures, ambulatory surgery centers, physical therapy centers, and DMEPOS suppliers.

Investigation
Womens Leadership
Committee

LITIGATION & REGULATORY EXPERIENCE

In addition to her healthcare practice, Ms. Geroux has extensive experience in general commercial civil litigation and appeals, as well as other regulatory matters, including issues pertaining to federal and state Disadvantaged Business Entity certifications and cybersecurity investigations and Reporting obligations. Among her more notable achievements are her successful defense of a restaurateur against claims of trademark infringement; serving on the litigation team for a tier-one automotive supplier that successfully pursued claims of trade secret and patent infringement against a competitor supplier; a series of victories in the state trial and appellate courts on behalf a real estate developer regarding its purchase of state-owned property; reversal of an MDOT DBE decertification decision and the reversal of a decertification decision by the Veterans Administration regarding a Service-Disabled Veteran Owned Small Business enterprise. In 2005, Ms. Geroux was appointed a Special Attorney General to represent the Michigan Public Service Commission in its appellate matters.

MEMBERSHIPS & COMMUNITY INVOLVEMENT

Ms. Geroux's professional memberships include: the State Bar of Michigan (including the Health Law Section), the American Bar Association (including the Health Law and Litigation Sections), the Federal Bar Association, the Oakland County Bar Association, and the Health Care Compliance Association. She also assisted with numerous pro bono projects for Community Legal Services (n/k/a Michigan Community Resources), which resulted in the publication of various white papers and primers on such topics related to Community Land Trusts and Affordability Preservation, as well as a Manual regarding malpractice and liability issues facing non-profit healthcare facilities such as free clinics, FQHCs and FQHC look-alikes and low-cost clinics. Ms. Geroux has also been actively involved within her community, both professionally and personally. Currently, she serves on the Board of Directors for Honor Community Health, an FQHC serving

DEBRA A. GEROUX

Oakland County, Michigan, and as the Vice President of the Board of Directors for the Historical Society for the U.S. District Court for the Eastern District of Michigan. Ms. Geroux has also served as an Adjunct Professor of Healthcare Law at The Michigan State University College of Law and previously taught Healthcare Insurance Law in the Paralegal Program at Baker College of Auburn Hills.

She is admitted to practice in all Michigan state courts, as well as the United States District Courts for the Eastern and Western Districts of Michigan and the United States Court of Appeals for the Sixth Circuit.

RECOGNITIONS & CERTIFICATIONS

- *Best Lawyers in America, Lawyer of the Year, Health Care Law, 2022*
- *Best Lawyers in America, Health Care Law, 2018 - 2022, Commercial Litigation, 2021-2022*
- *Michigan Super Lawyers, Health Care, 2017-2021*
- *DBusiness Top Lawyers in Metro Detroit, Health Care Law, 2012, 2014, 2017-2020*
- *Certified in Healthcare Privacy Compliance (CHPC), 2018*
- *Certified in Healthcare Compliance (CHC), 2012*
- Licensed Attorney, State Bar of Michigan [P50955], 1995

PUBLICATIONS, PRESENTATIONS & SEMINARS

- Co-Presenter, State Bar of Michigan, Health Care Law Section 2021 Annual Meeting, *Cybersecurity & Incident Response: The Nuts & Bolts of Detecting, Avoiding, and/or Responding to a Security Incident* (9.23.21)
- Podcast Co-Presenter, "Debra Geroux and Scott Wrobel on Responding to Data Breaches", *Compliance Perspectives Podcast, The Compliance & Ethics Blog* (6.8.21)
- Co-Author, Butzel Client Alert, "Mask Up Michigan" - Governor Whitmer Furthers Her MI Safe Start Plan Order By Rescinding Prohibition On Routine Healthcare Services And Procedures (5.21.20)
- HCLS Webinar Co-Presenter, State Bar of Michigan, Health Care Law Section, *CARES Act & Healthcare Provider Relief Programs: Are There Strings Attached to 'No Strings Attached' Money?* (5.6.20)
- Co-Author, Butzel Client Alert, *OIG Expands Its Authority* (4.30.20)
- Co-Author, Butzel Client Alert, *Next Round Of HHS CARES Act Provider Relief Fund Payments* (4.29.20)
- Co-Author, Butzel Client Alert, *Can I Be Liable For That? Issues Of Liability During The COVID-19 Pandemic* (4.23.20)
- Co-Author, Butzel Long Client Alert, *FCC Provides Telehealth Funding...But Act Fast* (4.21.20)
- Co-Author, Butzel Client Alert, *HHS's CARES Act Provider Relief Fund Payment Attestation Portal Is Open!* (4.16.20)
- Co-Author, Butzel Client Alert, *CMS Rolls Out Relief Payments To Healthcare Providers Under CARES Act Provider Relief Fund* (4.14.20)

DEBRA A. GEROUX

- Webinar Co-Presenter, *CARES Act Provider Relief Payments: Are there strings attached to “no strings attached” money?* (4.22.20)
- Webinar Co-Presenter, *Executive Orders on COVID-19: What Healthcare Providers Need to Know* (3.26.20)
- Co-Author, Butzel Client Alert, *Department of Health & Human Services and Department of Education Revamp Guidance on the Intersection of HIPAA and FERPA on Student Health Records* (1.6.20)
- Co-Author, Butzel Client Alert, *DHHS’s Regulatory Sprint to Coordinated Care Gains Traction in Changes to Stark Regulations* (12.17.19)
- Co-Author, Butzel Client Alert, *DHHS’s Regulatory Sprint to Coordinated Care Gains Traction in Changes to AKS, Stark and CMP Laws* (12.5.19)
- Co-Author, *Whitepaper: Licensure & Certification: Process & Investigations*, SBM Health care Law Section (Rev. Summer 2019)
- Reviewer, AHLA Corporate Practice of Medicine Review (Michigan) (Summer 2019)
- Panelist, Medical Main Street, *Cyber Security Hacks in Healthcare: Protecting Your Health Data* (6.26.19)
- Attendee, HCCA Ann Arbor Regional Conference (6.21.19)
- Co-Author, Butzel Client Alert, *No-Fault Auto Insurance Changes Are Here* (6.18.19)
- Presenter, Michigan Ambulatory Surgery Association, *Cybersecurity Awareness & Incident Response* (6.6.19)
- Co-Author, Butzel Client Alert, *HHS Issues Guidance to Business Associates Regarding Their Direct Liability under HIPAA* (5.30.19)
- Co-Author, Butzel Client Alert, *HHS Announces Reduction in Maximum Penalties For HIPAA Violations* (4.29.19)
- Speaker, CHA Boston Regional Meeting, *Proposed Changes to HIPAA Rules* (4.10.19)
- Co-Presenter, HCCA 2019 Compliance Institute, *Your Lawyer / Your Business Associates: Understanding the Dual roles that Lawyers Play for Their Healthcare Clients* (4.9.19)
- Attendee, HCCA Compliance Institute (4.7.19 – 4.10.19)
- Co-Author, Butzel Client Alert, *The Next Phase of Medicare: Telemedicine Reimbursement* (8.13.18)
- Moderator/Panelist, *The Autonomous Patient: Entrepreneurs Driving Health Care II*® (3.13.18)
- Co-Author, Butzel Client Alert, *CMS Bans Texting of Patient Orders!* (1.3.18)
- Presenter, Michigan Ambulatory Surgery Association, Education Day 2017, *60 Days and Counting: Will Your Center Meet the NEW CMS Emergency Preparedness Requirements?* (9.15.17)
- Co-Author, Butzel Client Alert, *Michigan Gets Aggressive in Its Efforts to Combat Opioid Abuse* (12.29.17)

DEBRA A. GEROUX

- Co-Author, Butzel Client Alert, *WannaCry Impacts and Lessons are Global* (5.23.17)
- Panelist, Women in Defense (WID), Michigan Chapter, *Combatting Human Trafficking: A Dialogue For Business & Community* (5.9.17)
- Panelist, *The Autonomous Patient: Entrepreneurs Driving Health Care*® (3.23.17)
- Co-Author, Butzel Client Alert, *New Administration: Continued Emphasis on Compliance* (1.20.17)
- Co-Author, Butzel Client Alert, *Suffer a Small HIPAA Breach? OCR May be Looking for You!* (9.30.16)
- Co-Author, Butzel Client Alert, *Federal Government Extends Moratorium on New HHAs and Ambulance Suppliers* (8.8.16)
- White Paper, *HIPAA Phase II Audits Are Underway...Will You Be Ready?* (6.6.16)
- Author, Butzel Client Alert, *OIG Issues Revised Exclusion Guidance That Emphasizes the Need for an Effective Compliance Program* (4.22.16)
- Attendee, HCCA Compliance Institute (4.17.16 – 4.20.16)
- Co-Presenter, Butzel Webinar, *HIPAA & ACA Update Webinar: It's Time for Your Annual Check-Up* (2.25.16)
- Presenter, Michigan Ambulatory Surgery Association, *New Year New Compliance Cycle* (2.2.16)
- Co-Author, Butzel Client Alert, *Responding to the Government's Increased Emphasis on Compliance* (1.16)
- Co-Author, Butzel Client Alert, *Compliance Efforts in 2016* (1.8.16)
- Co-Author, Butzel Client Alert, *OIG Releases 2016 Work Plan* (11.6.15)
- Presenter, Michigan Ambulatory Surgery Association, Education Day 2015, *Update on CMS Enrollment/Re-Enrollment Activities-Focusing on Questionable Billing Practice and Compliance* (10.30.15)
- Co-Author, Butzel Client Alert, *Communicating with Patients Under HIPAA and the TCPA: The Good, the Bad and the "Do-Not-Call"* (10.26.15)
- Detroit Legal News, *Asked and Answered...Qui Tam Lawsuits* (8.27.15)
- Co-Author, Butzel Client Alert, *CMS Continues to Extend Freeze on New HHA and Ambulance Supplier Enrollments* (7.27.15)
- Co-Presenter, HCCA 2015 Compliance Institute, *Lawyers in the Twilight Zone: Ethics, Privileges and Duties for Lawyers in Compliance Roles* (4.22.15)
- Co-Author, Butzel Client Alert, *OIG Issues Practical Guidance Tool for Health Care Board Oversight* (4.21.15)
- Attendee, HCCA Compliance Institute (2013, 2014, 2015, 2016, 2018)
- Co-Author, Butzel Client Alert, *CMS Continues to Freeze Out Home Health Agencies and Ambulance Suppliers in HEAT Locations with another 6-month Extension of Moratorium on New Enrollment* (2.9.15)

DEBRA A. GEROUX

- Co-Author, *Summary of OIG's 2015 Work Plan*, AHLA Fraud and Abuse Practice Group, Compliance Committee Member Briefing (12.18.14)
- Presenter, Michigan Ambulatory Surgery Association, Education Day 2014, *HIPAA Phase II Audits—Is Your Center Ready for an OCR HIPAA Audit?* (10.10.14)
- Author, *Healthcare Compliance Programs Under the ACA—Are You Ready?* HEALTH CARE MICHIGAN, Vol. 30, No. 9 (9.1.14)
- Author, *OIG Issues Proposed Rule Expanding Its CMP Authority in Accordance with the ACA*, AHLA Practice Groups Email Alert (5.22.14)
- Attendee, HCCA Compliance Institute (3.29.14 – 4.2.14)
- Co-Author, *Executive Summary of OIG's 2014 Work Plan*, AHLA Fraud and Abuse Practice Group, Compliance Committee Member Briefing (2.1.14)
- Co-Author, Butzel Client Alert, *CMS Moratorium Ices Home Health Agencies and Ambulance Companies in HEAT Locations* (1.31.14)
- Co-Presenter, Michigan Ambulatory Surgery Association, *The Roadmap To Compliance - the Importance of Staying Current on Your Compliance Efforts* (9.5.13)
- Author, *Mandatory Health care Compliance Programs—Is Your Client Ready?*, MICHIGAN LAWYERS WEEKLY (June 2013)
- Co-Presenter, HIPAA “Mega Rule” Breakfast Briefing, Automation Alley (3.22.13)
- Co-Author, *Whitepaper: Licensure & Certification: Process & Investigations*, SBM Health care Law Section (Fall 2012)
- Attendee, HCCA Basic Compliance Academy (11.11.12 – 11.15.12)
- Co-Author /contributor, ICLE Annual Health Law Institute (Various from 2007 – 2012)
- Co-Author, *Penalizing Substandard Care: The Next Step in Combating Health care Fraud and Abuse*, ABA Health Law Section The Health Lawyer (November 2012)
- Co-Author, Butzel Publication, *Health Care Reform Timeline* (6.14.10)
- Co-Presenter, MSU College of Law, Journal of Medicine and Law Symposium (March 2008)
- Panelist, MSU College of Law Diversity Week (February 2008)
- Co-Presenter, *Corporate Compliance Programs*, Michigan Ambulatory Surgery Association (3.16.06)
- Co-Presenter, *Expert Testimony in Michigan*, Sponsored by the MSU College of Law, Health Care Law Program (April 2003)
- Panelist, Health care Law in Michigan, MSU College of Law (Spring 2003)
- Contributing Author, 2002 Fraud & Abuse Manual, SBM Health Care Law Section
- Contributing Author, 1998 Year In Review, SBM Health Care Law Section

DEBRA A. GEROUX

Credentials

EDUCATION

Detroit College of Law at Michigan State University 1995, J.D.

Michigan State University 1988, B.S.

ADMISSIONS

Michigan

United States District Court for the Eastern District of Michigan

United States District Court for the Western District of Michigan

MEMBERSHIPS

Member, Board of Directors, Oakland Integrated Healthcare Network (April 2014–present)

Adjunct Faculty, Healthcare & Insurance Law, Baker College of Auburn Hills, Paralegal Program

State Bar of Michigan – Health Law Section

American Bar Association – Health Law Section

Health Care Compliance Association (HCCA)

American Health Lawyers Association (AHLA)

Federal Bar Association

Oakland County Bar Association

Michigan State College of Law & Detroit College of Law Alumni Association

Awards & Recognitions

Best Lawyers in America, Lawyer of the Year, Health Care Law, 2022

Best Lawyers in America, Health Care Law, 2018–2022; Commercial Litigation, 2021–2022

DBusiness Top Lawyers in Metro Detroit, Health Care Law, 2012, 2014, 2017–2022

DEBRA A. GEROUX

Certified in Healthcare Compliance (CHC) by the Compliance Certification Board in November 2012

Michigan Super Lawyers, Health Care, 2017-2021