

# Emergency Action Plan (EAP)

A Lexis Practice Advisor® Annotated Form by  
Erik Dullea and Stephanie Kaiser, Husch Blackwell LLP



Erik Dullea  
Husch Blackwell LLP



Stephanie Kaiser  
Husch Blackwell LLP

## Summary

This form is an Emergency Action Plan (EAP), which employers can use to respond to emergencies that pose hazards to employees in the workplace. This form contains practical guidance, drafting notes, and alternate clauses.

The Occupational Health and Safety Administration (OSHA) requires employers with 11 or more employees to keep their EAP in writing, at the workplace, and available for employees to review. 29 C.F.R. § 1910.38(b). Employers with 10 or less employees must, at a minimum, communicate the EAP to employees verbally. *Id.*

This Emergency Action Plan covers the applicable Occupational Health and Safety Administration (OSHA) EAP requirements in effect as of July 1, 2020.

- **Fire.** Procedures for reporting a fire at the workplace. 29 C.F.R. § 1910.38(c)(1).
  - **Evacuation.** Procedures for evacuating the workplace. 29 C.F.R. § 1910.38(c)(2).
  - **Procedure for critical plant operations.** Procedures for employees who must complete critical plant operations before evacuating. 29 C.F.R. § 1910.38(c)(3).
  - **Accounting for all employees.** Procedures to account for all employees after evacuation. 29 C.F.R. § 1910.38(c)(4).
  - **Rescue or medical duties.** Procedures for employees performing rescue or medical duties. 29 C.F.R. § 1910.38(c)(5).
  - **Point of contact.** The point of contact who can answer employee questions and provide more information regarding the EAP and employee duties under the EAP. 29 C.F.R. § 1910.38(c)(6).
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- **Alarm systems.** Employers must maintain an employee alarm system that provides distinct warnings to employees based on the type of emergency. 29 C.F.R. § 1910.38(d).
- **Training.** An employer must train employees to assist in a safe and orderly evacuation of other employees. 29 C.F.R. § 1910.38(e).
- **Triggering events for review.** An employer must review the EAP with each employee covered by the plan when “(1) the plan is developed or the employee is assigned initially to a job, (2) the employee’s responsibilities under the plan change, and (3) the plan is changed.” 29 C.F.R. § 1910.38(f).

29 C.F.R. § 1910.38. Also see [OSHA, How to Plan for Workplace Emergencies and Evacuations](#).

Typically, hazards that EAPs cover are associated with emergencies that arise in the physical realm (weather, security incidents, fires, and pandemics (including the coronavirus (COVID-19)) as opposed to business emergencies that might occur in the electronic/virtual realm (data breach, insider threats, ransomware), or emergencies experienced by other entities with consequences that spill over to affect the employer. While these business emergencies can have serious consequences for the survival of the business, they are less likely to result in immediate physical harm to employees who are at the workplace at the time the crisis begins.

Employers must recognize that emergencies are usually time critical events that require advance preparation to be handled properly. This includes ensuring that emergency exit routes are unobstructed, choosing primary and alternate assembly locations, and having a way to determine which employees were at the worksite when the emergency began.

Because of the time-critical nature of evacuations, the employer should discuss in advance the individuals authorized to call for an evacuation and the criteria under which evacuations will occur. It is important to note that this advanced planning is not intended to prevent any employee from sounding the alarm or initiating an emergency evacuation in the face of an obvious emergency (e.g., building fire), but rather to encourage discussion of the steps that need to be performed during an emergency to safely evacuate personnel and to shutdown equipment or processes (e.g., chemical manufacturing facilities) required to avoid making the emergency worse.

After an evacuation, employers must be able to accurately and quickly verify the whereabouts of employees. Not only should employers maintain a complete list of current staff, employers should have access to employees’ emergency contacts, but they should also establish a method of accounting for nonemployees, such as customers, suppliers, and other visitors, and set procedures for assisting them during an evacuation.

For additional information on emergency action plans, see [Business Continuity and Emergency Planning Checklist](#) and [Business Continuity and Emergency Planning](#). For an annotated business continuity plan, see [Business Continuity Plan](#).

For more guidance for preparing and responding to pandemic diseases, whether the coronavirus (COVID-19) or other widespread illnesses, see [Pandemic Flu/Influenza/Coronavirus \(COVID-19\): Key Employment Law Issues, Prevention, and Response](#) and [Pandemic Flu/Influenza/Coronavirus \(COVID-19\) Prevention and Response Checklist \(Best Practices for Employers\)](#).

For a resource kit focused on employees returning to work and broken up by key employment law topics, see [Coronavirus \(COVID-19\) Resource Kit: Return to Work](#). For more guidance on a wide variety of COVID-19 legal issues, see [Coronavirus \(COVID-19\) Resource Kit](#). For tracking of key federal, state, and local COVID-19-related Labor & Employment legal developments, see [Coronavirus \(COVID-19\) Federal and State Employment Law Tracker](#). Also see state and federal COVID-19 legislative, regulatory, and executive order updates from State Net, which are available [here](#). For tracking of key federal, state, and local non-coronavirus Labor & Employment legal developments, see [Labor & Employment Key Legal Development Tracker](#).

For more articles on COVID-19 and the workplace by Castle Publications, as published on Lexis Practice Advisor, see [Returning to Work during and after COVID-19](#), [CDC Guidance and the Return to Work during COVID-19](#), [Wage and Hour Obligations for California Employers during COVID-19](#), [Wage and Hour Obligations for New York Employers during COVID-19](#), and [Leaves of Absence under Federal Law before and after the Families First Coronavirus Response Act \(FFCRA\)](#).

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## INTRODUCTION AND PURPOSE OF THE EMERGENCY ACTION PLAN

This Emergency Action Plan (EAP) will help [employer name] to effectively and efficiently respond to emergencies that pose a hazard to employees in the workplace. Such emergencies may include, among others, catastrophic weather events, security incidents, fires, and pandemics (including the coronavirus (COVID-19)). This Emergency Action Plan covers the applicable Occupational Health and Safety Administration (OSHA) EAP requirements in effect as of July 1, 2020.

### Drafting Note to Introduction

OSHA requires employers with 11 or more employees to keep their EAP in writing, at the workplace, and available for employees to review. 29 C.F.R. § 1910.38(b). Employers with 10 or less employees must, at a minimum, communicate the EAP to employees verbally. Id. For more information on which employers must develop an EAP, see [OSHA, Evacuation Planning Matrix - Appendix A: Does Your Facility Need an Emergency Action Plan?](#)

OSHA states that the following requirements apply to EAPs:

- **Fire.** Procedures for reporting a fire at the workplace. 29 C.F.R. § 1910.38(c)(1).
- **Evacuation.** Procedures for evacuating the workplace. 29 C.F.R. § 1910.38(c)(2).
- **Procedure for critical plant operations.** Procedures for employees who must complete critical plant operations before evacuating. 29 C.F.R. § 1910.38(c)(3).
- **Accounting for all employees.** Procedures to account for all employees after evacuation. 29 C.F.R. § 1910.38(c)(4).
- **Rescue or medical duties.** Procedures for employees performing rescue or medical duties. 29 C.F.R. § 1910.38(c)(5).
- **Point of contact.** The point of contact who can answer employee questions and provide more information regarding the EAP and employee duties under the EAP. 29 C.F.R. § 1910.38(c)(6).
- **Alarm systems.** Employers must maintain an employee alarm system that provides distinct warnings to employees based on the type of emergency. 29 C.F.R. § 1910.38(d).
- **Training.** An employer must train employees to assist in a safe and orderly evacuation of other employees. 29 C.F.R. § 1910.38(e).
- **Triggering events for review.** An employer must review the EAP with each employee covered by the plan when “(1) the plan is developed or the employee is assigned initially to a job, (2) the employee’s responsibilities under the plan change, and (3) the plan is changed.”

29 C.F.R. § 1910.38(f). 29 C.F.R. § 1910.38. Also see [OSHA, How to Plan for Workplace Emergencies and Evacuations.](#)

## SECTION 1. Planning for Evacuation in Advance of an Actual Emergency

- A. [Employer’s name] will train employees to help other employees evacuate during an emergency.
  - B. Always ensure that corridors, emergency exits, and stairwells are not to be blocked.
  - C. Maintain a personnel roster of individuals at the worksite, and known absences.
  - D. Each [employer] facility will designate specific individuals as evacuation coordinators / fire wardens who verify an evacuation is performed properly by:
    - i. Being familiar with alternate evacuation routes
    - ii. Closing fire doors
    - iii. Ensuring bathrooms and other private areas are empty
    - iv. Helping co-workers with special needs evacuate
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### **Drafting Note to Section 1.**

OSHA requires an employer to provide procedures for evacuating the workplace in an EAP. See 29 C.F.R. § 1910.38(c)(2). An employer must also train employees to assist in a safe and orderly evacuation of other employees. 29 C.F.R. § 1910.38(e). This section addresses these EAP requirements. Also see Section 3.: Emergency Evacuation Locations and Accounting for Employees Post-Evacuation, below.

Consider working closely with the following stakeholders to determine how to accomplish these tasks during an emergency:

- **Employer's safety department.** They will ensure corridors, exits, and stairwells are not blocked.
- **Employer's HR department.** They will maintain a personnel roster and known absences and they will be able retrieve that information after evacuating the premises.
- **Employee volunteers who are regularly at the job site.** They will be intimately familiar with the physical layout of the facility and be able help properly facilitate an evacuation. People who are traveling frequently will likely not be the best candidates for this task.

If you are drafting an EAP for union-represented employees, see Alternate Section 1.

### **Alternate Section 1.:**

#### **SECTION 1. Planning Items in Advance of an Actual Emergency**

- A. Always ensure that corridors, emergency exits, and stairwells are not to be blocked.
- B. Maintain a personnel roster of individuals at the worksite, and known absences.
- C. Consider whether the employer's collective bargaining agreements or past practices have established Employee Safety Committees. If this is the case, determine whether the committee members must be involved in the selection of fire wardens. The fire wardens should verify an evacuation is performed properly by:
  - i. Being familiar with alternate evacuation routes
  - ii. Closing fire doors
  - iii. Ensuring bathrooms and other private areas are empty
  - iv. Helping co-workers with special needs evacuate

### **Drafting Note to Alternate Section 1.**

Use Alternate Section 1. when drafting an EAP for union-represented employees.

#### **SECTION 2. Emergency Alarm/Warning Systems and Reporting the Emergency**

- A. The [employer name] facility emergency warning systems consist of the following types of alarms for particular conditions:
    - i. Fire
    - ii. Chemical release
    - iii. Tornado
  - B. The preferred means of reporting emergencies are [preferred means for reporting emergencies (e.g., manual pull box alarms, public address systems, radio, email, telephones, and/or other methods)]. [Employer name] will post emergency telephone numbers near [locations (e.g., telephones, employee notice boards, and/or other conspicuous locations)]. Where a communication system also serves as the employee alarm system, all emergency messages will take priority over all non-emergency messages.
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C. The procedure for sounding emergency alarms in the facility is as follows: [procedure for sounding the alarms in the facility].

**Drafting Note to Section 2.**

Employers must confer with the individuals/organizations responsible for the facility's maintenance, which may be the employer's landlord, to discuss which types of alarms are required, already in place, and feasible.

OSHA requires employers to have and maintain an employee alarm system. See 29 C.F.R. § 1910.38(d). The employee alarm system must use a distinctive signal for each purpose and comply with the emergency alarm system requirements in 29 C.F.R. § 1910.165. The applicable regulation describes the general requirements for the alarm system as follows:

- (1) **The employee alarm system shall provide warning for necessary emergency action as called for in the emergency action plan, or for reaction time for safe escape of employees from the workplace or the immediate work area, or both.**
- (2) **The employee alarm shall be capable of being perceived above ambient noise or light levels by all employees in the affected portions of the workplace.** Tactile devices may be used to alert those employees who would not otherwise be able to recognize the audible or visual alarm.
- (3) **The employee alarm shall be distinctive and recognizable as a signal to evacuate the work area or to perform actions designated under the emergency action plan.**
- (4) **The employer shall explain to each employee the preferred means of reporting emergencies, such as manual pull box alarms, public address systems, radio or telephones.** The employer shall post emergency telephone numbers near telephones, or employee notice boards, and other conspicuous locations when telephones serve as a means of reporting emergencies. Where a communication system also serves as the employee alarm system, all emergency messages shall have priority over all non-emergency messages.
- (5) **The employer shall establish procedures for sounding emergency alarms in the workplace.** For those employers with 10 or fewer employees in a particular workplace, direct voice communication is an acceptable procedure for sounding the alarm provided all employees can hear the alarm. Such workplaces need not have a back-up system.

29 C.F.R. § 1910.165(b) (emphasis added).

**SECTION 3. Emergency Evacuation Locations and Accounting for Employees Post-Evacuation**

- A. After an evacuation, employees should gather in the primary assembly location. See chart below entitled Emergency Evacuation Locations for primary assembly locations.
- B. If the primary location is not safe, employees should gather at the alternate assembly location. See chart below entitled Emergency Evacuation Locations for alternate assembly locations.
- C. The senior official at the assembly location must perform a roll call and identify the names and last known locations of any employee who is missing or unaccounted for. He or she must pass that information to the official-in-charge.
- D. After roll call by the most senior officer present, employees may be released to assist with the post-emergency response, to notify their families, or to return home.

**EMERGENCY EVACUATION LOCATIONS**

**Headquarters**

Primary  
Alternate

**Operations Site 1**

Primary  
Alternate

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## Operations Site 2

Primary  
Alternate

## Support Site 1

Primary  
Alternate

## Support Site 2

Primary  
Alternate

### Drafting Note to Section 3.

OSHA requires the EAP to address procedures for accounting for all employees after the evacuation. See 29 C.F.R. § 1910.38(c)(4). The EAP must also explain procedures for evacuating the workplace. See 29 C.F.R. § 1910.38(c)(2). This section is meant to satisfy these EAP requirements. Also see Section 1.: Planning for Evacuation in Advance of an Actual Emergency, above.

Consider whether it is feasible to remind employees to refrain from posting on social media during an evacuation, except to say they are healthy and safe.

## SECTION 4. Procedure to Handle Critical Facility Operations during Emergency

[Customized procedure for employees who must remain to complete critical facility operations during an emergency and before evacuating.]

### Drafting Note to Section 4.

OSHA requires the EAP to discuss procedures that must “be followed by employees who remain to operate critical plant operations before they evacuate.” See 29 C.F.R. § 1910.38(c)(3). Because critical facility operations and employees who must perform them will vary so widely between employers, the employer will need to customize this section to its unique situation and needs.

## SECTION 5. Employees Performing Rescue or Medical Duties

- A. Some emergencies will require employees to perform rescue or medical duties. For example, this can happen when employees are injured when they are trying to evacuate the facility.
- B. [Employer name] will designate first aid responders who can help with these medical and rescue duties to the extent of their capabilities.
- C. External medical and rescue professionals will also assist in medical and rescue duties once they arrive to help handle the emergency.
- D. Employee first aid responders should defer to external medical and rescue responders once they arrive.

### Drafting Note to Section 5.

OSHA requires the EAP to address “procedures to be followed by employees performing rescue or medical duties.” See 29 C.F.R. § 1910.38(c)(5). This section addresses this OSHA EAP requirement.

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## SECTION 6. **Fire**

- A. Fire wardens must verbally remind employees of the preferred exit route(s)—primary or alternate based on known conditions.
- B. Confirm the fire has been reported to first responders.
- C. After ensuring that all personnel have cleared the premises, contact the fire department at 911.
- D. The fire department should have a fire marshal appointed for each floor of the building who will ensure that all staff have evacuated.

### **Drafting Note to Section 6.**

OSHA specifically requires the EAP to contain procedures for reporting fires in the workplace. See 29 C.F.R. § 1910.38(c)(1). This section addresses this OSHA EAP requirement.

For information on OSHA fire regulations, see 29 C.F.R. § 1926.150. Also see [Occupational Safety and Health Administration: Fire Safety](#).

## SECTION 7. **Flash Flooding**

- A. During the planning phase, evaluate whether particular exits and stairwells are likely to be accessible or not.
- B. Evaluate conditions in the facility, and determine whether an evacuation or remaining within the facility is the safer course of action for employees.
- C. Determine whether the emergency exits and stairwells are accessible for actual use.
- D. If evacuating the building, conduct the evacuation in a similar fashion to a fire drill.
- E. After an evacuation, employees should gather in the primary assembly location.
- F. If the primary location is not safe employees should gather at the alternate location.
- G. The senior official at the assembly location must perform a roll call, and identify the names and last known locations of any employee who is missing or unaccounted for, and pass that information to the official-in-charge.
- H. After roll call by the most senior officer present, employees may be released to assist with the post-emergency response, to notify their families, or to return home.
- I. Remind employees that driving home during flash flooding can be equally dangerous.

## SECTION 8. **Wind Damage-Severe Weather**

- A. During sustained high winds or a severe thunderstorm, employees should move away from the glass exterior and into the interior of the building or into the basement.

## SECTION 9. **Bomb Threat Procedures**

- A. When threats are received by telephone, every effort should be made to determine the person's voice characteristics, age, and sex, as well as any background noise.
  - B. Note the exact words used and ask where the bomb is hidden, what it looks like, and when it is set to go off.
  - C. Take notes and keep the caller on the telephone as long as possible.
  - D. If there is a bomb threat, a determination will be made if evacuation is necessary.
  - E. If evacuation is necessary, instructions will be given, and all employees should meet at the designated meeting location.
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**Drafting Note to Section 9.**

Employers should consult with local law enforcement and the regional FBI office to confirm that the procedures for a bomb threat are in line with law enforcement recommendations and the threats to the applicable industry sector.

**SECTION 10. Terrorist Attack / Shooter**

- A. In the event of an active threat by a hostile individual, employees must be prepared to deal with the situation.
- B. Find FBI and Homeland Security guidance at the following websites:
  - i. <https://www.fbi.gov/about/partnerships/office-of-partner-engagement/active-shooter-resources>
  - ii. [https://www.dhs.gov/xlibrary/assets/active\\_shooter\\_booklet.pdf](https://www.dhs.gov/xlibrary/assets/active_shooter_booklet.pdf)
  - iii. [https://www.dhs.gov/xlibrary/assets/active\\_shooter\\_pocket\\_card.pdf](https://www.dhs.gov/xlibrary/assets/active_shooter_pocket_card.pdf)
  - iv. <https://www.cisa.gov/active-shooter-preparedness>
- C. Individuals should remember the FBI guidance: RUN, HIDE, FIGHT (if no other choice).
- D. Evacuate the building if possible.
- E. If it's not possible to evacuate, hide quietly in a locked room with the door barricaded and cell phone silenced. Remember that vibrate is not silent.
- F. When it is safe to do so, notify law enforcement.
- G. Action against the threat should only be taken as a last resort and only if someone's life is in imminent danger.
- H. When law enforcement has contained the situation and all employees are safe, the Business Continuity team will activate the Business Continuity Plan (BCP).

**Drafting Note to Section 10.**

Like Section 9., employers should consult with local law enforcement and the regional FBI office to seek advice for active shooter preparations based on the unique characteristics of the employer's facility.

For more information on Business Continuity Plans (BCPs), see [Business Continuity and Emergency Planning](#).

**SECTION 11. Review of the EAP with Employees Covered by the EAP**

[Employer name] will review the EAP with employees covered by the EAP when any of the following events occur:

- A. When [employer name] first develops the EAP
- B. The employee initially receives a responsibility under the EAP
- C. The employee's responsibilities under the EAP change
- D. [Employer name] changes the EAP

**Drafting Note to Section 11.**

OSHA requires employers to review the EAP with each employee "covered by the plan" at each particular worksite, when "(1) the plan is developed or the employee is assigned initially to a job, under the EAP, (2) the employee's responsibilities under the EAP change, and (3) the employer changes the EAP." 29 C.F.R. § 1910.38(f). This section addresses this OSHA EAP requirement.

For a section on training employees on the EAP that goes beyond what OSHA requires, see Alternate Section 11..

**Alternate Section 11.:**

**SECTION 11. Training of Employees on the EAP**

[Employer name] will review the EAP with employees covered by the EAP when any of the following events occur:

- A. When [Employer name] first develops the EAP
- B. The employee initially receives a responsibility under the EAP
- C. The employee's responsibilities under the EAP change
- D. [Employer name] changes the EAP

In addition, not only must all employees review the EAP, but [employer name] will also [annually (or another time frame)] provide all employees with a presentation on the EAP followed by a live simulation of an emergency situation.

**Drafting Note to Alternate Section 11.**

Some employers prefer to go further than OSHA's EAP review requirements and choose to provide more in-depth training on the EAP to all employees.

**SECTION 12. Point of Contact for Answering EAP Questions**

For all questions concerning the EAP, please contact [name], [title].

**Drafting Note to Section 12.**

OSHA requires that the EAP state "the point of contact who can answer employee questions and provide more information regarding the EAP and employee duties under the EAP." 29 C.F.R. § 1910.38(c)(6). The employer should designate a senior employee for this role who preferably has experience with emergency management.

**SECTION 13. Employee Acknowledgment Form**

[Employer name] personnel are expected to review and understand the EAP.

After reviewing the contents of the EAP, employees are expected to sign the Acknowledgment Form below.

**Emergency Action Plan Acknowledgment**

I have read and understand my responsibilities in the Emergency Action Plan and I understand the importance of my responsibilities.

\_\_\_\_\_  
Employee Signature and Date

\_\_\_\_\_  
Employee Printed Name

**Drafting Note to Section 13.**

Depending on the size of the workforce, consider whether it is feasible and practical to have all employees acknowledge in writing that they have received and understand the EAP. As an alternative, require employees who perform critical plant operations to sign the alternate form language.

**Alternate Section 13.:**

**SECTION 13. EAP Acknowledgment for Employees Performing Critical Shutdown Procedures**

**Emergency Action Plan Acknowledgment**

I have read and understand my responsibilities in the Emergency Action Plan.

I also understand that my job responsibilities include an expectation that certain plant operations will be turned off or shut down before I evacuate the facility.

In the event these plant operations are not shut down, there is a possibility of greater harm to lives and property than might occur otherwise.

\_\_\_\_\_  
Employee Signature and Date

\_\_\_\_\_  
Employee Printed Name

**Drafting Note to Alternate Section 13.**

In the event the workforce is too large to maintain acknowledgment forms for every employee, consider whether the acknowledgement form should be completed by those individuals who are responsible for performing critical shutdown procedures before evacuating the facility.

After reviewing the contents of the EAP, and after being trained on the critical procedures that must be performed, those employees are expected to sign the alternate Acknowledgment Form.

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### **Erik Dullea, Partner, Husch Blackwell LLP**

Erik focuses on administrative and regulatory law, with an emphasis on workplace safety and security in critical infrastructure sectors such as mining, energy and aviation. He has hands-on experience in multiple fields, bringing decades of military and private-sector experience to his legal practice.

Erik, a partner in Husch Blackwell's Denver office, advises employers on workplace safety and cybersecurity matters. He represents employers during enforcement actions brought by Federal and State safety agencies, such as the FAA, MSHA, OSHA, Cal-OSHA and the Arizona, New Mexico and Washington State Divisions of Occupational Safety and Health. These enforcement actions stem from agency inspections, whistleblower complaints and workplace accidents.

Erik's advice on safety and cybersecurity issues comes with unique insights that are based on his 30+ years of service in the U.S. Navy in the aviation and intelligence communities. Appreciating the expanding role that cybersecurity and privacy have in business, Erik recently acquired a Master of Science in Cybersecurity Law. He leverages this academic knowledge with his on-the-job-experience in military intelligence to advise clients on complex and rapidly changing issues in this field.

With more than 20 years of experience as a Navy and commercial pilot before law school, Erik is exceptionally positioned to advise aviation clients on safety and security matters. He was a military and commercial flight instructor and received specialized training from the Transportation Security Administration. Erik is currently the co-chair of Husch Blackwell's Unmanned Aircraft Systems practice group and in 2020 was elected as the Vice President of the Rocky Mountain Chapter of the Association of Unmanned Vehicle Systems, International (AUVSI) where he focuses on policy and regulatory issues for the unmanned aircraft industry.

### **Stephanie Kaiser, Partner, Husch Blackwell LLP**

Clients count on Husch Blackwell partner Stephanie E. Kaiser for sound judgment and practical guidance on a wide array of business and legal challenges. She routinely represents businesses, corporate executives, and boards of directors across multiple industries, including financial services, general and tower construction, healthcare, security systems and equipment, real estate, and energy. Stephanie serves as outside general counsel to a number of her clients and also serves as a Standards of Conduct Official and third-party whistleblower advisor, as well.

Stephanie's versatile litigation practice encompasses complex commercial litigation, matters involving bankruptcy and adversary proceedings, antitrust, intellectual property disputes, and regulatory proceedings. She has developed a reputation for successfully representing clients in bet-the-company, high-profile cases ranging from fraud, breach of contract, and breach of fiduciary duties, wrongful death, workplace disputes and personnel matters to unfair competition, intellectual property infringement cases, Lanham Act allegations, and lease disputes.

As a member of the firm's Financial Services & Capital Markets industry team, Stephanie has particular experience representing creditors in a variety of troubled commercial loan and consumer finance disputes. She has handled matters related to the Fair Credit Reporting Act, the Fair Debt Collection Practices Act, and Equal Credit Opportunity Act, as well as those related to consumer protection laws, the Dodd-Frank Act, and potential regulatory enforcement actions.

Based in the firm's Austin and Dallas offices, Stephanie regularly provides guidance on identifying and managing risk, develops policies and procedures, addresses and resolves internal conflicts and personnel disputes, and provides training and consulting to all levels within the organization.

More than a litigator, clients consider Stephanie a trusted business advisor. As outside general counsel or consultant, she routinely develops comprehensive legal strategies that address multiple interconnected and complex legal issues, addresses data breaches and security incidents, and handles anonymous, confidential, or sensitive complaints with frequency. She also routinely leads and develops client-related workshops and trainings on various topics of interest, including fiduciary duties, internal investigations, cybersecurity, and strategic business planning.

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