



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

**SHADOW CONFIDENTIALITY FORM**

GOVERNOR'S OFFICE OF GENERAL COUNSEL

Individuals who are permitted to shadow employees of the Office of General Counsel or an agency Office of Chief Counsel ("Shadowers") must protect the confidentiality of information accessed, obtained, heard about, or received in the course of their shadowing activities. Inappropriately accessing, disclosing, discussing, or using confidential information gained during shadowing activities may violate state or federal law. Confidential information consists of personal, sensitive, or non-public information including:

- information that is confidential by law (*e.g.*, Criminal History Information Act, Health Insurance Portability and Accountability Act);
- information associated with consideration of policy and legislative decisions, legal strategy, proprietary information, and personnel matters;
- information marked as confidential;
- information the confidential nature of which has been made known by the Governor's Office of General Counsel or agency Office of Chief Counsel to the Shadower; and
- information that due to its character and nature, a reasonable person under like circumstances would treat as confidential.

Shadowers shall not:

- Access any confidential information beyond that provided or expressly directed by their shadowing supervisor.
- Share, disclose, or discuss confidential information with any unauthorized individual or entity, including non-Commonwealth third parties and any Commonwealth or other government entity, official, employee, or agent not already expressly authorized to access the particular information as expressly confirmed to the Shadower by their shadowing supervisor prior to disclosure.
- Handle confidential information, files, systems, devices, or work areas in any way that would allow the information to be inadvertently accessed or disclosed without authorization.

I understand that any violation of the terms and conditions set forth herein could result in the removal of me from the Shadowing opportunity.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date