



San Juan Public Health

Visitor Policy & Security

Effective Date: January 2026

Applies To: All employees

1. Purpose

The San Juan Public Health Department (SJPH) serves patients/clients/patrons whose privacy must be respected and whose personal information must always remain confidential.

If you bring a guest (e.g., family members or friends) into the building, they must remain at your desk or in the kitchen and are not permitted in clinical areas or hallways. If they move outside these areas, you must always remain with them.

2. General Standard

- Keep **all** keys that open doors, file cabinets, lock boxes, or other secured areas hidden and stored in a safe place.
- Ensure workstation is clear of any protected information.
- Device security is practiced by locking computer screens when leaving workstation and keeping screens out of view of visitors in your office.
- **DO NOT** share the back-door access code with **anyone** who is not staff.

3. HIPAA Violations and Risks

HIPAA violations involve improper handling of Protected Health Information (PHI):

- Discussing patient/client information loudly
- Mishandling records

- Failure to properly safeguard information
 - PHI in view of guest
 - Unauthorized access to building
 - Unlocked cabinets when not present

Possible penalties for civil violations include:

- Unknowing - \$100 - \$50,000 per violation
 - Reasonable Cause - \$1,000 - \$50,000 per violation
 - Willful neglect but violation is corrected within stated period - \$10,000 - \$50,000
 - Willful neglect but not corrected - \$50,000 - \$1 MIL
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4. Enforcement

All employees are responsible for ensuring compliance with this policy. Employees who do not adhere to the Visitor & Security Policy may be subject to corrective action and up to termination if noncompliance persists.

5. Policy Review

This policy will be reviewed periodically and may be updated to reflect any enforcement agency amendments, operational needs, public health standards, or community expectations.

The back door code will be changed periodically.