



**Antelope Valley**  
Medical Center®

# **Our Values in Action**

## **Code of Conduct**



# Mission

AVMC is devoted to providing innovative, heartfelt care for the well-being of everyone in our community.

# Vision

To lead the future of health care with proven experience, trust, revolutionary care, empathy, and an unrelenting commitment to you.

# Values

## Patients Come First

We listen actively and communicate with our patients and families, placing safety as a top priority.

## Accountability & Ownership

We fully complete tasks, are transparent, effectively communicate, and recognize that what we do reflects on us.

## Teamwork

We build trusting relationships, promote a sense of community, and are respectful of everyone. Success is about the whole team.

## Integrity & Honesty

We tell the truth at all times, speak up when something is wrong, and do the right thing when no one is looking.

## Excellence

We take pride in our work, are goal-oriented, and on a never-ending quest for top tier quality.

## Initiative & Innovation

Our can-do attitudes, creativity, and resourcefulness empower us to improve the patient's experience, solve our own problems, make timely decisions, and look for opportunities to add value.

## Tenderness & Compassion

We have genuine empathy, show kindness, and encourage and advocate for each other.

# Table of Contents

INTRODUCTION & PURPOSE.....	2
COMPLIANCE & INTEGRITY PROGRAM.....	3
Reporting Suspected Noncompliance and Other Concerns .....	3
PATIENTS COME FIRST .....	4
Patient Safety .....	4
Respecting Patients' Cultures .....	4
Interpreter Services .....	5
Protecting Patient Privacy .....	5
Consequences .....	5
ACCOUNTABILITY & OWNERSHIP .....	6
Use of Medical Center Equipment .....	6
Use of Medical Center Information Systems .....	6
Recording & Reporting Information .....	7
Confidentiality .....	7
Accidental Disclosure .....	7
Direct Requests for Information .....	7
TEAMWORK .....	8
Diversity & Inclusion .....	8
Conflict Resolution .....	9
Cooperating With Inspectors.....	9
Bullying, Harassment & Discrimination .....	9
INTEGRITY & HONESTY .....	10
Conflicts of Interest.....	10
Patient Referrals – Stark Law & Anti-Kickback Statutes.....	10
Gifts & Other Considerations .....	11
Fraud, Waste & Abuse .....	11
False Claims Act .....	11
Whistleblower Protection .....	12
Political Activities & Contributions .....	12
EXCELLENCE .....	13
Quality of Care .....	13
Standards of Behavior.....	14
Marketing Activities .....	14
Social Media.....	14
INITIATIVE & INNOVATION .....	16
Reporting a Concern .....	16
Retaliation or Retribution .....	17
Maintaining a Safe Workplace .....	17
Special Responsibility for Managers .....	17
TENDERNESS & COMPASSION.....	18
Mandated Reporting .....	18
Expected Behaviors .....	19
Relationships With Our Vendors .....	19
Preventing Workplace Violence .....	19
Clinical Ethics Program .....	19
AVMC OFFICERS.....	20

# Introduction & Purpose

As representatives of Antelope Valley Medical Center (AVMC), we play an important role in our community; and the people we serve place an enormous amount of trust in us. Our ongoing vision is to lead the future of health care with proven experience, trust, revolutionary care, empathy, and an unrelenting commitment to you. As you know, we work in a heavily regulated environment that touches the lives of people every day, which is why it is important to have well-publicized ethical and compliance standards in place to follow when providing care, services or treatment.

The standards we have put in place not only reflect AVMC's applicable regulatory requirements, but also allow us to demonstrate a high level of ethics at all times. We are guided by AVMC's mission and values and must conduct ourselves within these standards. Our values support our vision, allow us to fulfill our mission, and shape the culture of our organization.

This Code of Conduct helps us identify and apply these values in our daily operations, decision-making processes and interactions with others. It serves as a cultural compass for staff, management, physicians, vendors, volunteers, contract workers, and others who work with or represent AVMC. As a representative of AVMC, your responsibilities are to:

- Complete all required regulatory and compliance training.
- Support, follow and maintain current knowledge of AVMC policies and procedures that apply to your work.
- Speak up if you have a question or concern; report violations of laws, regulations and policies; and refuse to participate in illegal or unethical acts.

We are each guardians of AVMC's reputation. While it is not possible to anticipate every situation we might face, the practice of behaving with the highest level of integrity and professionalism is an individual responsibility. The guiding principles of our Code of Conduct encourage each one of us to care for our patients, their families and each other with respect and honesty. The code also provides direction on how to handle concerns about unethical, illegal or improper behaviors.



# Compliance & Integrity Program

Compliance is everyone's responsibility. Federal regulations mandate that healthcare providers ensure the creation of and commitment to a formal compliance program. As a result, AVMC has developed and implemented the Compliance & Integrity Program, which includes this Code of Conduct as well as AVMC's compliance policies and procedures. This program is a proactive way for all of us to discuss business and ethical issues in a safe environment, free of retaliation and/or criticism. All employees are expected to use good judgment, be accountable for their actions, and conduct services with integrity and the patient's best interest in mind. With the support of the executive management team and the board of directors, the Compliance Officer is responsible for the administration of a successful program.

## REPORTING SUSPECTED NONCOMPLIANCE AND OTHER CONCERNS

AVMC has many options for you to report compliance concerns, questionable conduct, or actual violations of law or AVMC standards. You can:

- Contact the Compliance Officer directly.
- Call the Integrity Line.\*
- Report on the Portal using Vigilanz application.\*

\* These methods allow for anonymous reports and inquiries.

# VigiLanz

Report Employee, Patient, and  
Security Events

How to access Patient Safety Events Module:

On the AVMC Portal go to:

- Quick Access
- Operation sub-heading
- "Vigilanz Patient Safety Events"

You will not need to enter a password for the module.



Integrity Line  
888-768-6152



# Patients Come First

We actively listen and communicate with our patients and their loved ones, placing patient safety as a top priority.

## PATIENT SAFETY

Safety is an important AVMC value, and we all play a role in ensuring safety. We encourage all to be vigilant so that everyone who steps into our hospital is safe. This includes reporting safety issues, incidents and “near misses,” so they can be addressed in a timely manner through policy and process changes without fear or blame. If you become aware of an unsafe situation, you have a duty to report it to your supervisor and the Patient Safety Officer, as well as, submit a report via AVMC's electronic event reporting system, Vigilanz.

## RESPECTING PATIENTS' CULTURES

We have the privilege of serving a diverse population. As a representative of AVMC, you have the responsibility to be considerate and respectful of our patients' and their families' cultural needs and values. Our goal is to be unbiased and culturally appropriate when providing healthcare services, which includes incorporating the diverse health beliefs, practices and communication preferences of our patients.

## INTERPRETER SERVICES

We are committed to providing our patients with quality care in the language they prefer. For patients who have limited English proficiency or are deaf or hard of hearing, AVMC offers reasonable

accommodations from medically qualified interpreters 24/7 at no charge. To access interpreter services, call our contracted vendor at **844-230-9637** or request “Language Services” from any AVMC phone to be automatically connected.

## PROTECTING PATIENT PRIVACY

As a healthcare organization, we have a legal obligation to safeguard patients’ protected health information (PHI). This includes any information about health status, provision of healthcare or payment for services. To protect the privacy and security of our patients’ PHI, you may only access the **minimum necessary** PHI if you have **need-to-know** authority to do your job. Additionally, you are prohibited from using, disclosing or discussing patient-specific information with others unless it is essential to your job at AVMC. The laws governing PHI, include the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH Act), the California Security Breach Notification Law, and the California Confidentiality of Medical Information Act, among others.

We have policies and procedures regarding access to and use of PHI as well as tools to monitor, prevent and address violations.

## CONSEQUENCES

There are numerous federal and state laws, as well as the AVMC Code of Conduct, protecting the privacy and security of our patients. If you access, use or disclose protected PHI inappropriately, you may face prosecution by state and/or U.S. attorneys, monetary fines, other disciplinary actions and/or sanctions.

## YOU SHOULD ALWAYS

- Access *only* the **minimum amount of PHI necessary** to do your job.
- Shred PHI in the proper shredding containers, and never leave PHI out in the public eye.
- Logout or lock your computer screen when stepping away to prevent unauthorized access to PHI.
- Contact the medical records department if you wish to access your own patient records. It is not permitted to access your own records without following the proper process.
- If an email message contains PHI, the message must be encrypted before sending it to an external recipient outside of AVMC’s network. You can encrypt the message by typing “encrypt” or “secure” in the subject line.
- Contact the Privacy Officer if you have a concern regarding a privacy issue or to report a violation. It is your responsibility to report a concern.



# Accountability & Ownership

We fully complete tasks, are transparent, effectively communicate, and recognize that what we do reflects on everyone. We have a genuine passion for our work and are enthusiastic about achieving our vision, no matter how small or difficult. We inspire others through our positive energy and enthusiasm.

## USE OF HOSPITAL EQUIPMENT

Hospital equipment is to be used for AVMC healthcare and business purposes only. It must be handled with care and protected from all forms of misuse, waste, damage and loss. You may not use AVMC equipment for personal gain or benefit, nor can you dispose of equipment without authorization from a supervisor.

## USE OF HOSPITAL INFORMATION SYSTEMS

AVMC has many different information systems, including email, voicemail, electronic health records, an intranet, and access to the internet over AVMC's network. These resources are to assist you in providing care to patients or to conduct AVMC business and must be used in accordance with applicable policies.



All communication, including electronic communications on AVMC owned handheld devices, must be done in a professional, respectful and lawful manner. Never use AVMC information systems to engage in activities for personal reasons or to engage in activities that are illegal, illicit or violate AVMC policies. When using AVMC information systems, all data and communications, including email and voicemail, are the property of AVMC and can be monitored and reviewed without your prior consent. You must protect all AVMC information contained on AVMC owned electronic devices through encryption and password protection.

## RECORDING & REPORTING INFORMATION

You should record and report all information promptly, accurately and honestly. This includes not only reporting information correctly, but also organizing it in a way that does not mislead or misinform those who receive it. Submitting a document that contains false information is prohibited. Examples of this include an inaccurate time card or an expense report for meals not eaten, miles not driven, or any other expense not incurred. Dishonest reporting of information to external organizations and individuals outside AVMC is also strictly prohibited and could lead to civil or even criminal liability for you and AVMC.

## CONFIDENTIALITY

You are expected to treat all information entrusted to you with confidentiality. This includes, but is not limited to:

- Contract arrangements associated with AVMC services and products.
- Procedures used in producing computer or data-processing records.
- Personnel records and wage and salary data.
- Proprietary information and/or trade secrets.
- Proceedings from board of directors' executive/closed sessions.

## ACCIDENTAL DISCLOSURE

Accidental disclosure of confidential information can be just as harmful as intentional disclosure. To avoid this, take care not to discuss any proprietary or patient information:

- That has not been made public by AVMC.
- In the presence of others who are not authorized to have it (i.e., family members or friends, who might innocently or inadvertently pass the information on to someone else).
- In public or social settings (i.e., parties, social media).

## DIRECT REQUESTS FOR INFORMATION

All official or media requests for information regarding AVMC should be referred to the marketing department.



# Teamwork

We work together and collaborate to achieve top-tier quality. We build trusting relationships and a sense of community with our colleagues. We're collegial and respectful with everyone. We rely on each other for constructive feedback, and we brainstorm together to get creative ideas flowing. We work toward common goals by being united, inclusive and open to everyone's input. Seasoned employees work closely with new employees to mentor and provide support and motivation to achieve success. We know that our success is not about the individual, it's about the team.

## DIVERSITY & INCLUSION

AVMC employees have the right to receive fair and just treatment, and they have the responsibility to treat one another respectfully. We encourage diverse ideas and backgrounds, thus strengthening and creating an inclusive workplace in which everyone can succeed. We are committed to promoting and maintaining an inclusive, high-performing culture that celebrates innovative thinking and makes full use of each other's talents, experience and perspectives.

## CONFLICT RESOLUTION

AVMC has established a process for managing conflicts. A conflict that is not managed could adversely affect patient safety or quality. This is why conflict resolution is important. Some examples of conflict that may impact patient care include, but are not limited to:

- Conflict between colleagues.
- Conflict within a department.
- Conflict between different departments.
- Conflict between staff members and supervisors.
- Conflict between a medical staff member and executive management team member.
- Conflict between a medical staff member and a member of the nursing staff.

Whatever the situation may be, AVMC strongly encourages you to resolve conflicts at the department level before escalating them. If it can't be resolved at that level, follow the established chain of command for your department. If the chain of command is followed and the conflict still cannot be resolved, it should be reported to the human resources department for assistance. Until it is resolved, it is **NOT** acceptable to allow any conflict to adversely impact patient care. Remember, **PATIENTS COME FIRST**.

## COOPERATING WITH INSPECTORS

From time to time, federal and state agencies make announced or unannounced visits to AVMC to conduct inspections. Employees must cooperate with those officials and contact administration, your immediate supervisor, and quality management promptly.

## BULLYING, HARASSMENT & DISCRIMINATION

Antelope Valley Medical Center is committed to providing an environment that is free from bullying, harassment, discrimination, and other behavior(s) that could result in a nonproductive or hostile work environment. If you believe you have been subjected to such conduct, bring it to the attention of AVMC. If you believe you're being bullied or harassed, notify the human resources department immediately or use the AVMC Integrity Line (phone or web report). You should feel free to file a complaint without fear of retaliation.

# Integrity & Honesty

At Antelope Valley Medical Center, we are committed to “doing the right thing for the right reason at the right time” and conducting ourselves with the utmost integrity. We do the right thing when no one is looking. We tell the truth at all times and we speak up when something is wrong.

## CONFLICTS OF INTEREST

Since 1955, our staff has strived to build a reputation as a trusted partner and pioneer in our community. Maintaining and protecting that reputation depends directly on our actions and the integrity with which we conduct ourselves. Conflicts of interest occur any time relationships or personal financial interests influence your ability to make fair and objective decisions. When potential conflicts of interest are not handled correctly, AVMC can be at risk of fines, lawsuits, criticism from the community and negative media coverage.

### **Duty to Disclose**

You have the duty to disclose any existing or potential conflicts of interest as soon as they arise. A conflict-of-interest disclosure form must be submitted annually by all workforce members in which all conflicts **MUST** be disclosed. Failure to disclose any conflicts will result in disciplinary action, up to and including termination. If you are unsure if you have a conflict, you are responsible for contacting the Compliance Officer for additional guidance.

### **Outside Employment and Business Interests**

You are not permitted to work on any personal business venture on AVMC premises or while working on AVMC time. You must also abstain from any decision or discussion affecting AVMC when serving as a member of an outside organization or board.

### **Contracting with AVMC**

You may not contract with AVMC to be a supplier of goods or services, represent a supplier, or work for a supplier to AVMC while you work for AVMC.

## PATIENT REFERRALS – STARK LAW & ANTI-KICKBACK STATUTES

AVMC abides by federal and state Anti-Kickback Statutes and the physician self-referral law, known as the Stark Law. In compliance with these laws, AVMC, physicians, and its employees must never offer pay or accept payment or other remuneration for a referral of business or patients. Referrals and admissions shall be made solely based on a patient’s medical needs. In addition, physician compensation arrangements are treated with extreme caution and scrutiny to ensure compliance with all laws and avoid technical violations.



## GIFTS AND OTHER CONSIDERATIONS

The key principles you must follow when it comes to gifts and other considerations are:

1. NEVER accept or solicit anything in exchange for patient referrals or AVMC business.
2. NEVER offer anything in exchange for patient referrals or AVMC business.
3. NEVER accept cash or cash equivalents (gift certificates or gift cards) by an external party for any reason.
4. NEVER offer or accept anything that influences your decision-making and your ability to act in the best interest of AVMC and our patients.
5. NEVER offer or accept anything that will jeopardize the district's reputation.

Gifts and considerations that do not violate the above principles are subject to AVMC's established policy, which clearly defines limits for offering and accepting gifts. There are also requirements in place to disclose the receipt or acceptance of certain items in your conflict-of-interest disclosure form. AVMC does permit the acceptance of gifts of nominal (little to no) value such as consumables and perishables that are shared among other workforce members. If you are unsure about accepting or offering a gift, err on the side of caution and contact the Compliance Officer for guidance.

## FRAUD, WASTE & ABUSE

AVMC cares for patients who are covered by federal and state healthcare programs. These programs have many strict requirements and laws designed to ensure that taxpayer money is spent only on care that is needed. While fraud requires malicious intent be proven, waste and abuse do not require malicious intent be proven in order to be found guilty.

## FALSE CLAIMS ACT

AVMC provides Deficit Reduction Act False Claims Act education. The Federal False Claims Act was enacted to reduce fraud, waste, and abuse of federal funds by providers when taking care of federal healthcare program beneficiaries. In addition to the federal False Claims Act, the State of California has established its own False Claims Act for state healthcare program beneficiaries. Both of these laws prohibit any healthcare provider from filing a false or fraudulent claim or retaining known over-payments. AVMC is committed to complying with these requirements by submitting accurate and truthful bills for our services. We ensure our bills meet federal healthcare program requirements, are accurate and complete, and are supported by medically necessary services. If you discover a billing error or other potential false claim, it is your responsibility to file a timely report so it can be promptly investigated and re-mediated.

## WHISTLEBLOWER PROTECTION

The False Claims Act also provides whistleblower protection for any individual that comes forth to report fraudulent billing or the filing of false claims. You are protected by law from any sort of retaliation. In accordance with our value – Integrity & Honesty – we always encourage individuals to speak up when something is wrong.

## POLITICAL ACTIVITIES & CONTRIBUTIONS

AVMC encourages everyone to participate in the political process. However, as a public agency we are prohibited from conducting political activities during work hours as well as any use of AVMC resources to engage in these activities. Your political activities should not reference AVMC or your position at AVMC. It is also prohibited for you to:

- Enter, directly or indirectly, any political contribution on your expense account that causes AVMC to reimburse you for that expense. This includes the cost of fundraising tickets for political functions and fundraising dinners. Even if business is discussed, it is against AVMC policy and possibly illegal to include such costs on your expense report.
- Use any AVMC property, facilities, employee time, or intranet for any political activity. Examples of prohibited actions include using AVMC secretarial time to send invitations for political fundraising events, using a AVMC telephone to make politically-motivated solicitations, allowing any candidate to use AVMC meeting rooms for political campaigning, and using AVMC property in a political campaign.
- Use AVMC email service to communicate personal opinions to other individuals, elected representatives, government agencies, newspapers, periodicals or other external organizations. Since the email address includes AVMC name and is visible to those receiving the email, your personal opinions might be construed as official AVMC policy.

## NOTE

Anyone in a leadership position who is involved in a political activity must be particularly aware that these activities carry inherent risk of creating the appearance of a AVMC endorsement. Therefore, certain political activities must be avoided unless the individual takes appropriate actions, which may include resigning the leadership position.

Because the political process has become highly regulated, workforce members should consult with Compliance & Integrity Program staff before agreeing to do anything that could be construed as involving AVMC in any political activity at the federal, state, or local level or in any foreign country.



# Excellence

We are on a never-ending quest for top-tier quality in everything we do. We are self-aware of how our words and actions affect our patients and colleagues. We ensure appropriate resources are made available to achieve our goals. We are discerning and know that small acts carry big meanings, and we respect and appreciate the work that others do. We take pride in our work and are goal-oriented. We always look for safe and efficient ways to do something. We don't create a process for process' sake.

## QUALITY OF CARE

At AVMC, we define excellence in service as the high quality with which our services are provided. We are mindful of desired outcomes when caring for our patients. When you are working, remember that our patients deserve the absolute best. The quality and safety plans we have established focus on meeting or exceeding national standards for quality care and patient safety.

AVMC takes a leadership role in the communities we serve. We create and sponsor organizational and educational programs and help influence changes that make local residents healthier. We can help improve the health of everyone, especially those who are most vulnerable. We believe everyone should have access to high-quality healthcare, regardless of their ability to pay.

## STANDARDS OF BEHAVIOR

AVMC's reputation is everyone's responsibility. You influence the community's perception of the quality of care and customer service provided at AVMC. If there are issues regarding your work at AVMC, there are ways to properly address them with your supervisor or the human resources department. Take care not to publicly disparage AVMC, the services we provide, the services we receive from vendors, nor the people working for AVMC.

We do not engage in disruptive behaviors as they interfere with patient care, cause stress among staff, affect morale and undermine our core values.

## MARKETING ACTIVITIES

AVMC's marketing department engages in a variety of communications, advertising, community outreach, media relations, recruitment, and awareness-building activities to maintain a strong brand within the community to continually reinforce AVMC's commitment to excellence. In compliance with federal and state laws, our marketing practices are truthful, informative and non-deceptive. The department is responsible for maintaining a consistent and professional image for all marketing messages and materials.

All promotional materials must be reviewed and approved by the department director prior to printing, posting or distributing. Additionally, authorization by marketing is required before a third party (i.e., vendor, community partner) is allowed to use AVMC's name or logo in their communications.

The marketing department is responsible for all contact with the media. All media inquiries must be directed to marketing. Only persons specifically selected to serve as spokespersons may communicate with the media on behalf of AVMC.



## SOCIAL MEDIA

Many of you use social media in your personal lives. While social media tools can be informative and fun, they also require great discretion and thoughtfulness. What you post or transmit electronically can have far-reaching personal, professional and even legal implications. Anything you post online or via electronic message can be retrieved and viewed indefinitely (even if it has been deleted).

Social media may not be used while you are on duty or in patient-care areas. Posting information on patients, affiliates, or members of the public which pertain to Health Insurance Portability and Accountability Act (HIPAA) is strictly prohibited. This also includes any information that invokes any other privacy laws, including generally private or confidential information.



As a representative of Antelope Valley Medical Center, your posts have the power to impact lives and reflect on our organization, both positively and negatively.

The following are general guidelines for employees or affiliates' participating in social media and online communications. For the full policy, please refer to the Social Media Policy (RI.2).

- Be professional, use good judgment, and be accurate and honest in your communications; errors, omissions, or unprofessional language or behavior reflect poorly on AVMC, and may result in liability for you or AVMC. Be respectful and professional to fellow employees, affiliates, and patients. Ensure that your social media activity does not interfere with your work commitments.
- Your social media activity must not include AVMC logos or trademarks, unless such use is approved by the CEO or by the Director of Marketing & Public Relations.
- Avoid posting photos of yourself in which your hospital badge is visible.
- Refrain from offering medical advice online.
- Refrain from friending/following patients. Staff in patient-care roles generally should not initiate or accept friend requests with a patient unless an in-person friendship existed outside of the patient-caregiver relationship.

The following activities via any social media platform are strictly prohibited:

- Making false or untrue statements that cannot be supported by evidence and are detrimental to the business. Individuals may be held personally liable for defamatory or misleading statements made online.
- Sharing confidential or proprietary AVMC information.
- Threatening, disparaging or harassing a co-worker.
- Do not speak on behalf of AVMC unless authorized to do so.
- Strictly prohibited content: personal attacks; cyber bullying, harassment, vulgar, hateful, violent or racist language; slurs, stereotyping, hate speech, and other forms of discrimination based on any race, religion, national origin, disability or sexual orientation. Information that may provoke threats to the security of Antelope Valley Medical Center employees, affiliates, patients or assets.
- Where your connection with the hospital is apparent, make it clear you are speaking for yourself and not on behalf of the hospital. (i.e. in your 'About Me' section or social media profile): "The views expressed on this page are my own and do not reflect the views of my employer."
- AVMC does not discriminate against any views, but reserves the right to delete or hide any of the following: duplicative comments made by the same user, comments that contact strictly prohibited conduct, comments that are obscene, pose a threat, invoke public safety concerns, incite violence, solicitations, encourage illegal activity, etc.

We welcome all feedback from employees, both positive and negative, that will help us transform the organization into an employer of choice. We have created proper channels for employees to convey feedback in place of posting to social media sites.

# Initiative & Innovation

We are empowered to speak up and act to improve the patient experience, quality, cost effectiveness, and new programs that add value. We evaluate opportunities, make timely decisions and take swift action. We take responsibility for solving problems, look for opportunities to improve, and make a positive difference in our jobs every day. Our can-do attitudes, creativity, and resourcefulness empower us to solve our problems effectively before needing to escalate. We are expected to solve problems at the local level. Issues that have institutional impact are elevated.

## REPORTING A CONCERN

Remember, if you have a concern or become aware of an activity that appears to violate applicable federal and state laws, this Code of Conduct or AVMC policies, **you have a duty to report** it. Doing the right thing is your responsibility. No one has the authority to instruct you to deviate from this code or any other applicable regulations, standards or policies. If you are aware of an unlawful or unethical situation, there are several ways you can bring it to AVMC's attention. Please see page 3 of this booklet for information about how to report a concern. All reports of unlawful or unethical conduct will be investigated promptly. You also should feel comfortable bringing up a concern that involves your own mistake.



## RETALIATION OR RETRIBUTION

AVMC does **NOT** tolerate threats or acts of retaliation or retribution against anyone who reports a concern in good faith or participates in an investigation into a report. In addition, AVMC policy ensures that no one will be punished for reporting something s/he reasonably believed to be an improper activity or violation of a compliance standard. However, if after an investigation, AVMC reasonably concludes that someone knowingly fabricated, distorted, exaggerated, or minimized the facts to either cause harm to someone else or to protect or benefit themselves, they may be subject to disciplinary action. If you believe you are being subjected to any kind of retaliatory behavior, you must report it to human resources immediately.

## MAINTAINING A SAFE WORKPLACE

All employees play a role in maintaining a safe and healthy working environment. You have a responsibility to work safely and report any unsafe conditions immediately. If possible, take the initiative to correct a potential safety issue before it is too late. AVMC takes safety very seriously and has established an environment-of-care program to establish procedures that keep us and our patients safe. You can help by:

- Minimizing potential health and safety hazards whenever possible.
- Storing and disposing of medical, chemical and other waste in accordance with AVMC's policies.
- Completing the safety education modules in the Annual Regulatory Review.
- Reporting safety concerns to your immediate supervisor, to AVMC's Safety Officer at **661-949-5538** or via Vigilanz the safety event reporting tool on the AVMC Portal.
- Reading and maintaining current knowledge of AVMC's Environment of Care Policy & Procedure Manual and incorporating them into your workflow.

## SPECIAL RESPONSIBILITY FOR MANAGERS

Managers have the special responsibility to set the right tone for learning and understanding how their work relates to AVMC's values and commitments. For this reason, managers must talk about these values and welcome any questions workforce members may have. Answering questions with, "Because we've always done it that way," stifles innovation and keeps us from being our best. Managers must also set an ethical example and take action when ethical issues are raised. They are responsible for familiarizing their workforce members with this code and for supporting workforce members who report violations in good faith. An environment should be created where workforce members are free to report issues without fear of retaliation. They must also seek help when the right decision is not clear.





# Tenderness & Compassion

We have genuine empathy for others, always focusing on our purpose and the role we play in a healing environment. We diffuse drama, actively listen, praise and encourage, show kindness, and advocate for others.

## MANDATED REPORTING

The California legislature has adopted various laws to protect children, dependent adults, and the elderly from various types of abuse and neglect. Among other things, these laws establish mandated reporting requirements, which must be followed by certain individuals who either interact with or assume the care of dependent adults and children. In accordance with these requirements, AVMC has policies and procedures in place for the management of cases in which suspected child abuse or elder/dependent adult abuse has occurred. All workforce members are required to be aware of these requirements and our internal processes to help protect patients as well as remain compliant with these regulations.



## EXPECTED BEHAVIORS

Our value of tenderness and compassion should compel us to nurture the physical and emotional well-being of our patients. It should also drive our attitudes when working with each other to best serve our patients. In keeping with this value, all employees, volunteers, vendors, medical staff, and contracted staff are expected to treat others with courtesy and respect.

## RELATIONSHIPS WITH OUR VENDORS

Vendors, suppliers, contractors, consultants, business partners, and others with whom we do business are vital to our success. We expect them to adhere to this Code of Conduct and always treat us with the same respect, fairness and professionalism that we demonstrate to them. We are careful whom we partner with by looking into our vendors' backgrounds and confirming they are not excluded from federal program participation. They are expected to consistently use the electronic vendor credentialing system upon every entry to AVMC. We may terminate our arrangements with vendors who do not follow our Code of Conduct when providing services to AVMC.

## PREVENTING WORKPLACE VIOLENCE

California Occupational Safety and Health Administration (OSHA) defines workplace violence as any act or threat of physical violence, harassment, intimidation, or other threatening disruptive behavior that occurs at the work site. It ranges from threats and verbal abuse to physical assaults and even homicide. It can affect and involve employees, patients, customers and visitors. You may have the ability to de-escalate and diffuse a situation before it becomes dangerous by using good judgment and, if necessary, calling security for assistance.



## Antelope Valley Medical Center Officers

Civil Rights Coordinator – Employees  
661-949-5152

Civil Rights Coordinator – Patients  
661-949-5650

Compliance Officer  
661-949-5153

Hospital Safety Officer  
661-949-5565

Infection Control Officer  
661-726-6040

Information Security Officer  
661-949-5577

Medication Safety Officer  
661-726-6045

Patient Safety Officer  
661-949-5583

Privacy Officer  
661-949-5670

Risk/Regulatory Director  
661-726-6038

### NOTE

Outside of normal business hours, call the House Supervisor (ext.6733) or Nursing Office (ext.5440). They are available 24/7 to respond and escalate appropriately.





# Antelope Valley Medical Center®

1600 West Avenue J | Lancaster, CA 93534

(661) 949-5000 | [www.avmc.org](http://www.avmc.org)

Follow us [@avmedicalcenter](https://www.instagram.com/avmedicalcenter)

