Vendor, Subcontractor, and Subdelegate Code of Conduct

tango is committed to the highest standards of compliance, ethics, and integrity. This Code of Conduct establishes minimum expectations for vendors, subcontractors, consultants, business associates, and subdelegates supporting tango and its health plan customers.

Organizations performing services on behalf of tango are expected to comply with applicable federal and state laws, CMS and Medicaid (as applicable) requirements, contractual obligations, compliance program requirements, privacy and security requirements, audit activities, fraud, waste and abuse prevention requirements, exclusion screening requirements, and member protection standards.

1. Member Rights and Protections

- Treat members with dignity and respect.
- Support member choice and informed decision-making.
- Protect privacy and confidentiality.
- Avoid unlawful discrimination.
- Prohibit retaliation.
- Support timely access to medically necessary services and care.

2. Compliance with Policies, Regulations, and Laws

- Comply with applicable federal, state, and local laws, regulations, CMS guidance, and contractual obligations.
- Comply with workplace safety, labor, human rights, anti-harassment, anti-trafficking, and environmental requirements.

3. Privacy, Confidentiality, and Security

- Protect PHI, PII, and confidential information.
- Maintain appropriate administrative, technical, and physical safeguards.
- Promptly report any actual, suspected, or potential privacy, confidentiality, security, or data protection incident involving tango information, systems, members, providers, workforce members, or business operations to compliance@tangocare.com
- Cooperate with investigations, notifications, mitigation, and corrective actions.
- Organizations are responsible for protecting proprietary and confidential information, even after the work is complete or the business relationship has ended.

4. Responsible Use of Artificial Intelligence and Technology

- Use AI technologies in compliance with applicable laws and contractual requirements.
- Do not enter tango delegated member information into unapproved AI systems.
- Maintain safeguards for confidential and protected information.
- Cooperate with tango's AI governance, privacy, and security requirements when applicable.

5. Fraud, Waste, and Abuse and False Claims Act

- Comply with FWA and false claims requirements.
- Promptly report suspected violations.

6. Conflicts of Interest

- Disclose actual, potential, or perceived conflicts of interest.
- Avoid situations that could improperly influence business decisions.

7. Ethical Conduct and Professional Integrity

- Conduct business honestly, ethically, and professionally.

8. Gifts and Gratuities

- Do not offer or accept gifts or benefits that could improperly influence decisions.

9. Quality of Care and Clinical Integrity

- Maintain licensure and qualifications.
- Provide medically necessary services.
- Maintain accurate documentation and cooperate with oversight activities.
- Promptly report quality-of-care concerns that may impact members.

10. Record Retention and Audits

- Maintain required records in accordance with contractual and regulatory requirements and cooperate with audits, reviews, and investigations.

11. Environmental Responsibility

- Comply with applicable environmental requirements and support sustainable practices.

12. Health Care Sanction Screening

- Ensure workforce members are not excluded, debarred, or otherwise ineligible to participate in government health care programs.

13. Non-Discrimination and Accessibility

- Provide services without discrimination and support accessibility and language assistance requirements.

14. Compliance Training, Monitoring, and Acknowledgment

- Educate workforce members regarding this Code and monitor compliance.

15. Reporting Actual or Suspected Concerns

- Vendors are expected to promptly report any actual, potential, or suspected concerns involving compliance, fraud, waste and abuse (FWA), privacy, security, quality of care, ethical conduct, or violations of applicable laws, regulations, contractual requirements, or this Code of Conduct. Reports may be submitted to tango's Compliance Department at compliance@tangocare.com or through the Compliance Hotline at 1-844-491-2558
- tango prohibits retaliation against good-faith reporting.