

**BHDDH**

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**Program Year 3 Guidance Documents – Public Comments**

While we understand that basing attribution to AE's based on IHH and ACT enrollment can increase the complexity of managing attribution, it is the most appropriate attribution for behavioral health recipients who have a diagnosis of serious mental illness. These programs are intensive and interact with clients on a daily, weekly or at least monthly basis. Clinically, it makes the most sense to base their attribution on the provider that bears the most responsibility for their care which are the IHH/ACT providers.

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