



myAvatar Contingency Plan Policy

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Policy It is the policy of the Department of Behavioral Health (DBH) to comply with HIPAA requirements to establish policies and procedures for responding to an emergency or other occurrence that damages or interferes with the operations of the electronic health record (myAvatar).

Purpose The purpose of this policy is to establish instructions for the DBH workforce to provide and document ongoing services to clients when access to the DBH electronic health record, myAvatar, is disrupted. Occurrences that disrupt access to ePHI may include but are not limited to power outage, vandalism, system failure, emergency, or natural disaster. Consequences of these occurrences may include inability to connect to the sbcounty.gov domain, DBH Documents webpage, the internet, and/or myAvatar.

Definition(s) **Criticality:** A measure of the degree to which an organization (DBH) depends on the information or information system (myAvatar) for the success of a mission or of a business function.

DBH Security Officer: Under general direction, develops, implements, and administers DBH practices, policies, and procedures related to the security rules implemented pursuant to the Health Insurance Portability and Accountability Act (HIPAA).

Electronic Protected Health Information (ePHI): Protected health information (PHI) that is produced, saved, transferred or received in an electronic form.

Essential Resources: Resources needed to access myAvatar data (ex. power to computer; access to sbcounty.gov domain, DBH website, the internet, and operational myAvatar server(s)).

myAvatar Contingency Plan: Instructions for actions to be conducted during a period of time in which access to myAvatar data is disrupted.

Data Backup Plan The Data Backup Plan is required for creation and maintenance of exact copies of ePHI contained in myAvatar.

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Data Backup Plan, continued

myAvatar data shall be backed up following the 3-2-1 principle:

- DBH shall maintain three (3) digital copies of myAvatar;
- Two (2) of these copies are stored at alternate locations, and
- One (1) of these copies is on an alternative storage medium.

myAvatar data must be backed up once a week or after changes have been made by server (whichever is sooner). This ensures that myAvatar data is current for use by providers when needed.

Disaster Recovery Plan

Procedures have been established to restore any loss of data and are detailed in the San Bernardino County Department Emergency Operations Plan (DEOP):

- DEOP provides planning and program guidance for implementing the elements of continuity planning and programs to ensure all County Departments/Agencies are capable of conducting their respective essential missions and functions under all threats and conditions.

Applications and Data Criticality Analysis

DBH will rely on the information Technology (IT) department for the development, integration, and management of the information technology and operational technology used.

Using critical analysis, DBH will prioritize projects according to organizational goals, or components according to system functionality.

DBH will use critical analysis as a component of a comprehensive risk management approach and consider all risks, including information security and privacy risks, and prioritize and tailor controls to those risks.

Client Services

myAvatar Contingency Plan Procedure (IT5020-1) has been developed to ensure client services are provided and documented during the time access to myAvatar is disrupted.

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Related Policy or Procedure

DBH Standard Practice Manual:

- myAvatar Contingency Plan Procedure (IT5020-1)
 - Security of Protected Electronic Health Information Policy ([COM0923](#))
 - Data Integrity Policy ([COM0925](#))
 - Risk Assessment Policy ([IT5007](#))
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Reference(s)

- [Title 45 Code of Federal Regulations Section 164.308 \(a\)\(7\)\(i\): Standard: Contingency plan. Health Insurance Portability and Accountability Act of 1996 \(HIPAA\)](#)
 - [San Bernardino County Department Emergency Operations Plan \(DEOP\)](#)
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