16th April 2020

RE: Letter to all medical practitioners in Ireland regarding the requirement to notify all COVID-19 deaths to the Medical Officer of Health (MOH) in the local Public Health Department.

Dear Colleagues,

I am writing to remind you of the legal requirement of all medical practitioners in Ireland to notify all COVID-19 deaths to the Medical Officer of Health (MOH) in the local Public Health Department. COVID-19 deaths include deaths in all possible, probable and confirmed COVID-19 cases (as outlined in Appendix 1 below) and should all be notified. There should be no period of complete recovery between the illness and death.

All COVID-19 deaths (as outlined below) should be notified regardless of setting, including home, community and hospital settings:

- All deaths in patients with laboratory confirmed COVID-19
- All deaths in patients with a case classification of probable COVID-19, which includes patients that had indeterminate/inconclusive COVID-19 laboratory results.
- All deaths in patients suspected of having COVID-19 i.e. patients with symptoms clinically compatible with COVID-19 illness. These suspect deaths may or may not have been tested for COVID-19 prior to death or include patients with pending COVID-19 laboratory results.
- All unexplained deaths/sudden deaths in residential facilities with a confirmed/suspected COVID-19 cluster/outbreak of illness. These facilities include nursing homes, community hospitals/long stay units, and residential institutions such as mental health facilities, residential facilities related to disability services, direct provision centres, homeless hubs/hostels and prisons.
- Laboratory confirmed COVID-19 cases (including post mortem) are notified by the laboratories to Public Health via the Computerised Infectious Disease Reporting (CIDR) system.

Elderly patients can have an atypical symptomatic presentation of COVID-19 illness and are often unlikely to fulfil the classic case definition. The attending doctor’s clinical judgement and the coroner’s advice will inform the decision regarding cause of death in these scenarios.
Confirmed and suspected or possible Covid-19 related deaths are also reportable to the relevant District Coroner in every case (according to their guidance), so that early decisions can be made regarding the Death Notification Form, post mortem examinations, Coroner’s Investigation process and release of bodies to families through their nominated Funeral Director.

The death certificate should be completed promptly and in full (including primary and all secondary causes of death, and place of death) in circumstances where the coroner is not further investigating the death, following reporting to the coroner.

An online death registration portal is available, so families can register all deaths without delay https://www.gov.ie/en/service/49c66f-registering-a-death-in-ireland/#deaths-resulting-from-covid-19
It would be appreciated that if you could ensure that the relatives know this and are urged to use it as a quick way to register the death, particularly during this Covid-19 pandemic when it is essential to monitor all deaths in a timely fashion.

World Health Organisation (WHO) international guidelines on certification and classification (coding) of COVID-19 as a cause of death, are available at the following link: https://www.who.int/classifications/icd/covid19/en/

Thank you for your attention to this matter.

Yours sincerely,

Dr Lorraine Doherty
National Clinical Director Health Protection

Cc David Walsh
Liam Woods
Dr Anthony Breslin
Dr Augustine Pereira
Dr Breda Smyth
Dr Carmel Mullaney
Dr Deirdre Mulholland
Dr Mai Mannix
Dr Una Fallon
Dr Sean Denyer
Dr Anne Sheahan
Dr Aine McNamara
Appendix 1

COVID-19 interim case definition
https://www.hpsc.ie/a-z/respiratory/coronavirus/novelcoronavirus/casedefinitions/

Clinical criteria
A patient with acute respiratory illness (fever [1] and at least one sign/symptom of respiratory disease e.g., cough, shortness of breath)
OR
A patient with any acute respiratory illness AND having been in contact with a confirmed or probable COVID-19 case in the last 14 days prior to symptom onset
OR
A patient with severe acute respiratory illness (fever and at least one sign/symptom of respiratory disease e.g., cough, shortness of breath AND requiring hospitalization) AND in the absence of an alternative diagnosis that fully explains the clinical presentation.

Case Classification
Possible:
Case meets the clinical criteria of a suspect case above (and no alternative diagnosis, microbiological or non-infectious, has been found).

Probable:
A suspect case for whom testing for the COVID-19 virus is inconclusive. [2]
OR
A suspect case for whom testing could not be performed for any reason.

Confirmed:
A person with laboratory confirmation of COVID-19 infection, irrespective of clinical signs and symptoms.

Notes:
[1] Fever may be subjective or confirmed by healthcare worker (≥38°C)
[2] Inconclusive being the result of the test reported by the laboratory.

Date last updated: 09/04/2020

WHO Definition of a COVID-19 death
WHO has developed the following definition for reporting COVID deaths: a COVID-19 death is defined for surveillance purposes as a death resulting from a clinically compatible illness in a probable or confirmed COVID-19 case, unless there is a clear alternative cause of death that cannot be related to COVID disease (e.g., trauma). There should be no period of complete recovery between the illness and death. https://www.who.int/docs/default-source/coronaviruse/situation-reports/20200411-sitrep-82-covid-19.pdf?sfvrsn=74a5d15_2.