Information Note on the Implications of COVID-19 on the processing of Death Certificates

Registration of Deaths in Ireland

Background

It is a legal requirement that every death that takes place in the State must be recorded and registered and these records are then held in the General Register Office (GRO). A death within the State can be registered with any Registrar, regardless of where it occurs. Deaths must be registered as soon as possible after the death and no later than three months from the date of death.

Following a death, a registered medical practitioner who attended the deceased will complete and sign Part 1 of a Death Notification Form (DNF), and this will include information on the cause of death.

This form is then given to the spouse/partner or another relative of the deceased who are then the qualified informant for the death. If the deceased has no spouse/partner or other relative, then the form will be provided to another qualified informant.

The qualified informant must then complete Part 2 of this DNF with additional details regarding the deceased person. Once completed, this DNF must then be given to a Registrar (within, as per the above, a maximum of three months) and the qualified informant then signs the register in the presence of the Registrar. You do not need to be the next-of-kin to undertake this requirement.

The Cause of Death is completed by the medical practitioner who attended the deceased and has the following information:

- Part 1(a): Disease or condition directly leading to death, (this does not mean the mode of dying e.g. heart failure etc., it means the disease that caused death) due to (or as consequence of)
- Part 1(b): Antecedent Causes (morbid conditions, if any, giving rise to the above cause stating the underlying condition last) due to (or as consequence of)
- Part 1(c): Further Antecedent Causes
- Part 2: Other Significant Conditions (contributing to the death but not related to the disease or condition causing it)

Additional information supplied by the qualified informant includes the following information:

- Date and place of death
- Full name and surname of deceased
- Marital status of deceased
• Sex of deceased
• Age/date of birth of deceased
• Occupation of deceased

Any death that occurs in the State must be registered in the State, e.g. a death of a US resident holidaying in Ireland must be registered here. An Irish national that dies abroad is not registered in the State.

The registration of a death may be delayed where the death has been referred to a Coroner for investigation or inquiry. In such cases, the Coroner may issue a temporary certification to allow the death to be registered pending final determination of any investigation or inquiry.

Registration of Deaths Due to COVID-19 Pandemic

In light of the COVID-19 emergency, the General Register Office (GRO) has made changes to the death notification system. These changes allow qualified informants to either email or post a copy of the Death Notification Form (DNF) to the GRO but it does not change the timeframe in which this must be completed. The GRO has asked that qualified informants register deaths as quickly as possible, notwithstanding the requirement that all COVID-19 related deaths must be referred to a Coroner.

Analysis of Timing of the Submission of Deaths Data

An analysis of death data for Q4 2019 shows that the mean average number of days between the date of death and date of registration was 63 days while the median was 18 days. While this is consistent with previous quarters, it may change for deaths which are notified during the current COVID-19 emergency. Assuming a reasonable constancy of deaths on a year on basis, then an initial analysis comparing weekly deaths information for 2020 and 2019 would indicate additional delays in the notification of deaths. It is important to note, however, that this will require further investigation as the situation continues to evolve:

<table>
<thead>
<tr>
<th>Week Ending</th>
<th>2020</th>
<th>Week Ending</th>
<th>2019</th>
<th>Difference (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>w/e 18/3/2020</td>
<td>426</td>
<td>w/e 20/3/2019</td>
<td>506</td>
<td>- 15.8%</td>
</tr>
<tr>
<td>w/e 25/3/2020</td>
<td>500</td>
<td>w/e 27/3/2019</td>
<td>685</td>
<td>- 27.0%</td>
</tr>
<tr>
<td>w/e 01/4/2020</td>
<td>419</td>
<td>w/e 03/4/2019</td>
<td>623</td>
<td>-32.7%</td>
</tr>
</tbody>
</table>

Late Registered Deaths and the Coroner’s Office

The CSO publishes quarterly deaths data together with a summary of the four quarters (when publishing Quarter 4) classified by year of registration. It also publishes annual statistics on deaths by year of occurrence, with a time lag of about 22 months.

The most common reason for a late registration of a death is that a case is referred to the Coroner for further investigation.

All unnatural deaths (deaths from accidents, suicides, poisonings etc.) must be referred to the Coroner’s Office for further investigation and these deaths tend to be registered late as a
consequence. There are a variety of reasons for these late registrations including the holding of inquests, investigations by An Garda Síochána, the involvement of the office of the Director of Public Prosecutions (DPP), the Health and Safety Authority, Engineers reports etc. Furthermore, most deaths occur in areas with a higher population of persons and hence there is a larger workload for Dublin based Coroners.

In addition, all deaths that occur in nursing homes must also be referred to the Coroner. The number of late registered deaths is increasing over recent years and the CSO publishes these late registered deaths as an appendix to the annual report. Additional tables in respect of late registered suicide deaths are also made available each year.

**Assigning an Underlying Cause of Death to each Mortality Record**

An Underlying Cause of Death (UCOD) must be assigned to each death record by the Mortality Coders in the CSO. This is a complex process as coding rules that are adopted by the World Health Organisation (WHO) are applied to ensure parity between jurisdictions. The CSO is currently using ICD-10, the 10th revision of the International Statistical Classification of Diseases and Related Health Problems.

**Coding of Deaths Resulting from COVID-19**

On January 30 2020, the World Health Organisation (WHO) determined that the current outbreak of the novel coronavirus is a Public Health Emergency of International Concern (PHEIC) and the WHO has issued emergency codes for the ICD-10 classification to account for these COVID-19 related deaths. The WHO is continuing work on finalising these recommendations and any updates will be adhered to by the CSO. However, a death due to COVID-19 may not be attributed to another disease (e.g. cancer) and should be counted independently of pre-existing conditions that are suspected of triggering a severe case of COVID-19.

The international rules and guidelines for selecting the underlying cause of death for statistical tabulation apply when COVID-19 is reported on a death certificate but, given the intense public health requirements for data, COVID-19 is not considered as due to, or as an obvious consequence of, anything else in analogy to the coding rules applied for influenza.

**Conclusion**

The current system to notify and register deaths in Ireland does not allow the CSO to produce data in a timelier fashion that it currently does. The CSO is aware, in light of the current need for this data on deaths to be more timely, that consideration is being given to change the system of notification, and it would welcome any such changes.

Users should also be aware that assignment of the Underlying Cause of Death (UCOD) as being COVID-19 related will be a function of the death notification information submitted to the GRO and total deaths coded as such by the CSO may therefore differ from the death count as published by the Health Protection Surveillance Centre (HSPC) as these methodologies may differ.