HALTON REGION PUBLIC HEALTH • Office of the Medical Officer of Health

TEL: 905-825-6000 • TOLL FREE: 1-866-442-5866 • FAX: 905-825-1444

TO: Halton Physicians, Nurse Practitioners, Emergency Departments, other Healthcare Providers

FROM: Dr. Deepika Lobo, Associate Medical Officer of Health

DATE: January 28, 2022

RE: Ministry update re: COVID-19 reporting of deaths

QUICK FACTS

- The recent changes to COVID-19 testing guidelines in Ontario has led the Province to increasingly rely on hospitalization and death data to understand the current COVID-19 burden of disease in Ontario and inform pandemic response and planning.
- Please find attached a memo from the Ministry reminding about best practices for completing medical certificates of death and legal obligation to report deaths due to diseases of public health significance to local Medical Officer of Health.

MEDICAL CERTIFICATE OF DEATH COMPLETION

- When completing medical certificates of death, it is important to clearly distinguish between deaths directly caused by COVID-19 and deaths where the person may have tested positive for COVID-19, but the death resulted from another primary cause.
- Provincial expectations for death attribution are consistent with the World Health Organization (WHO):
    - i. COVID was the underlying cause of death
    - **ii.** COVID contributed to but was not the underlying cause of death
    - **iii.** COVID was unrelated to cause of death
    - **iv.** Cause of death was unknown
- If COVID was the underlying cause of death (category i), COVID-19 should be listed in Part I of the Cause of Death section of the Medical Certificate of Death, i.e. as the Immediate or Antecedent cause of death. More details and examples are in the WHO's Technical Note.
- If there was a clear alternative cause of death, COVID-19 should not be listed as the Immediate or Antecedent cause of death.

REPORTING OF DEATH FROM COVID-19

- Any death resulting from a disease of public health significance or where a disease of public health significance was a contributing cause of death, must be reported as soon as possible to Halton Region Public Health, ideally within 12 hours of death.

Please report all suspected/confirmed cases of Diseases of Public Health Significance (only report COVID-19 cases occurring in high-risk settings) to Public Health immediately by calling 311, 905-825-6000 or toll free at 1-866-442-5866.

PLEASE PROVIDE A COPY TO ALL PHYSICIANS IN YOUR OFFICE AND/OR POST IN EMERGENCY DEPARTMENTS AND PHYSICIAN LOUNGES. IF YOU HAVE ANY ISSUES WITH THIS ATTACHMENT, PLEASE EMAIL DOCTORS@HALTON.CA.

Ministry of Health

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January 26, 2022

MEMORANDUM

TO: All Physicians and Registered Nurses In The Extended Class, Ontario

FROM: Dr. Kieran Moore
Chief Medical Officer of Health of Ontario

RE: COVID-19 Reporting of Deaths

Dear colleagues,

I am writing with a request for your attention to death reporting. As you know, in response to the highly-transmissible Omicron variant, Ontario has adjusted its COVID-19 testing guidelines to prioritize testing for those at highest risk and working in highest risk settings, consistent with practice in other jurisdictions in Canada. In this context, we are no longer able to accurately track the total number of cases of COVID-19 in Ontario. We are therefore increasingly relying on hospitalization and death data to understand the current COVID-19 burden of disease in Ontario, which is key to our ongoing pandemic response and planning.

To support having highest quality data on deaths from COVID-19, we would like to remind you about best practices for the completion of medical certificates of death and about your legal obligation to report deaths from diseases of public health significance to your local Medical Officer of Health.

Medical Certificate of Death completion: Regarding the completion of the medical certificate of death, the provincial Medical Certificate of Death form requires attribution of the cause of death. In particular, it is very important to distinguish clearly between deaths that were directly caused by COVID-19 and deaths where the person may have tested positive for COVID-19 but the death resulted from another primary cause. We recognize that this distinction may be challenging in some cases.

Provincial expectations for death attribution are consistent with the World Health Organization categorization, which includes four categorizations related to COVID-19:

i. COVID was the underlying cause of death
ii. COVID contributed to but was not the underlying cause of death
iii. COVID was unrelated to cause of death
iv. Cause of death was unknown

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If COVID was the underlying cause of death (category i), **COVID-19** should be provided in Part I of the Cause of Death section of the Medical Certificate of Death, i.e. as the **Immediate or Antecedent** cause of death. For additional detail and examples, please see the Technical Note from the World Health Organization.

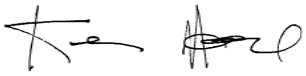
When there was a clear alternative cause of death, e.g, trauma, drug toxicity, other natural death process, at a time that the person was COVID-19 test positive but did not have a clinically compatible illness, COVID-19 should not be provided as the Immediate or Antecedent cause of death.

Reporting of death from COVID-19: The *Ontario Health Protection and Promotion Act* establishes the legal obligation for a physician or registered nurse in the extended class who signs a medical certificate of death to report any death where the cause of death was a disease of public health significance (category i above) or for which the disease of public health significance was a contributing cause of death (category ii above). The death should be reported as soon as possible to the local public health unit. Though not specified in the Act, we request that the report be made within 12 hours in the current context whenever feasible.

I want to acknowledge the tragedy of these preventable deaths from COVID-19, and the huge ongoing toll of COVID-19 on our province.

Thank you for your ongoing contributions to the COVID-19 response, including to the reporting of COVID-19 deaths.

Yours truly,



Kieran Michael Moore, MD, CCFP(EM), FCFP, MPH, DTM&H, FRCPC, FCAHS
Chief Medical Officer of Health

c:
Alison Blair, Associate Deputy Minister, Ministry of Health
Melanie Fraser, Associate Deputy Minister, Ministry of Health
Rhonda McMichael, Assistant Deputy Minister, Ministry of Health
Michael Hillmer, Assistant Deputy Minister, Ministry of Health
Dr. Dirk Huyer, Chief Coroner for Ontario, Ministry of the Solicitor General
Dr. Fiona Kouyoumdjian, Associate Chief Medical Officer of Health, Ministry of Health
Allen O'Dette, CEO, Ontario Medical Association