



Health Protection Surveillance Centre

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Deputy Michael McNamara
Dáil Éireann,
Kildare Street,
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Re: PQ 37303 To ask the Minister for Health the steps that have been taken to improve the quality of data on Covid-19 deaths both inside and outside of hospitals with respect to identifying persons for whom covid-19 was the cause of death, a co-factor and a nosocomial infection, respectively.

Dear Deputy McNamara

I refer to the above Parliamentary Question which has been referred by the Minister for Health to the Health Service Executive for direct response.

The following response only applies to mortality monitoring as it applies to the Health Protection Surveillance Centre (HPSC).

Under the 1981 Infectious Diseases Regulations with subsequent amendments (2020), clinicians and laboratories are legally obliged to notify the Health Protection Surveillance Centre (HPSC) of all COVID-19 cases. Since the beginning of the COVID-19 pandemic, when COVID-19 cases are reported to HPSC, the information should include the patients' outcome, including death. Other information such as if the infection is likely nosocomial, any underlying conditions and other epidemiological data are also reported. This information is reported to the National Infectious Diseases Reporting system (CIDR) and is incorporated into all HPSC epidemiological reports. These data including outcome data are constantly reviewed and validated by HPSC and updated as appropriate. In addition, regional departments of public health keep these cases under review and update the outcome variable on a continuous basis e.g. if a case dies it will be updated in a timely manner. This is a continuous dynamic process to ensure data completeness with regard to deaths and to improve the quality of the data.

In addition, HPSC receives a daily feed of all registered deaths from all-causes in Ireland. This is received from the General Register Office (GRO). These files are reviewed for COVID-19 deaths and cross checked with the cases on CIDR. If COVID-19 deaths on the GRO file are not on CIDR, they are updated accordingly following consultation with regional departments of public health. This ensures that all registered COVID-19 deaths are reflected on CIDR and included in HPSC reports. This ensures more complete data on COVID-19 deaths.

HPSC uses definitions for COVID-19 deaths based on World Health Organization (WHO) guidance^[1] and has also developed guidance on the notification of COVID-19 deaths for surveillance purposes. This guidance helps to classify deaths as due to COVID directly or not. These guidance are under ongoing review which is informed by evidence within the Irish clinical data, international experience, input on the interpretation of the data by other bodies in Ireland including from the Central Statistics Office, the GRO, academic institutions and ongoing WHO updates.

The Irish guidance advises on how to report COVID deaths to HPSC as follows:

1. *All possible, probable and confirmed COVID-19 deaths should be notified for surveillance purposes unless there is a clear alternative cause of death that cannot be related to COVID disease (e.g. trauma).*
 - a. *There should be no period of complete recovery from COVID-19 between illness and death.*
 - b. *Persons with COVID-19 may die directly due to accidents. Such deaths are not due to COVID-19 and should not be certified as such. This decision not to certify as COVID-19 death will be based on clinical judgement.*
2. *In some instances, a death due to COVID-19 may not be attributed to another disease (e.g. cancer) and should be counted as a COVID-19 death independently of pre-existing conditions that are suspected of triggering a severe course of COVID-19.*

If you require any further information or clarification please do contact us.

Yours sincerely,



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^[1] **WHO advice on reporting COVID-19 deaths as per [WHO document on International Guidelines for Certification and Classification \(Coding\) of COVID-19 as cause of death](#)**