STATE REGISTRAR NOTICE

Subject:  
Guidance for Coroners and Medical Examiners: Reporting of Deaths Attributed to COVID-19

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☐ Transitory

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Coroners/MEs

By Direction of:  
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State Registrar

The Bureau of Health Statistics and Registries (BHSR) is awaiting formal and detailed guidance from CDC’s National Center for Health Statistics on the reporting of deaths where Coronavirus Disease 2019 or COVID-19 has caused or is assumed to have caused or contributed to the death of a decedent. Below is interim guidance that has been developed by BHSR for coroners and medical examiners where a medical professional has referred a case to the coroner or medical examiner for investigation.

**Medical Certification**

In accordance with the Vital Statistics Law of 1953 (the Vital Statistics Law), the medical certification of all reports of death shall be completed by a medical professional who attended the deceased during the last illness. If the decedent is a family member of the medical professional or the medical professional is physically unable to certify the case, then the case shall be referred to another medical professional at that facility. If another medical professional is unavailable or unwilling to medically certify the death, the case shall be referred to the county coroner or medical examiner.

If the medical professional determines that the circumstances surrounding the death suggest that the death was sudden, violent, suspicious in nature, or was the result of other than natural causes, then the medical professional shall refer the case to the county coroner or medical examiner for investigation.

The coroner or medical examiner shall make an immediate investigation and shall certify the medical portion of reports of death for all cases referred for investigation. The coroner or medical examiner may not assume the reporting of these deaths unless a referral has been made in accordance with the Vital Statistics Law.

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1 A medical professional is defined as a physician, certified registered nurse practitioner, physician assistant, or dentist.
2 35 P.S. §§ 450.101 - 450.1003.
3 Id. at § 450.503.
4 Id. at §450.503(3)
Mandatory Electronic Reporting of Deaths

All deaths attributed to COVID-19 are required to be reported electronically to BHSR through Pennsylvania’s Electronic Death Registration System (EDRS) which is available online at https://www.dohdave.pa.gov. The paper “Certificate of Death” (form H105.143) or the Medical Certification Worksheet (form HD02036F) may not be used to report these deaths since there is a significant time lapse from the date of death until notification is received by BHSR. Due to the criticality of timely reporting at the state and national levels, EDRS must be used to report these deaths.

Coroners and medical examiners must submit the report of death through EDRS prior to release of the body to a funeral home. In accordance with the Vital Statistics Law, all deaths must be fully reported to BHSR within 4 days of the death occurring\(^5\). Full reporting of the death includes both a medical section (completed by a medical professional) and a personal and demographic section (completed by the funeral director). Therefore, coroners and medical examiners should strive to report the death within the first 48 hours following the time of death.

Coroners and medical examiners that have not yet adopted EDRS are encouraged to proactively obtain training and EDRS account credentials. To learn more about EDRS, visit the EDRS webpage at www.doh.pa.gov/edrs and then view the “Coroners/Medical Examiners” information. It only takes few minutes to set-up an account.

Collection and Submission of Postmortem Specimens from a Person Under Investigation (PUI)

Coroners and medical examiners should follow the Centers for Disease Control and Prevention has released “Interim Guidance for Collection and Submission of Postmortem Specimens from Deceased Persons Under Investigation (PUI) for Covid-19”. This guidance is available online at https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-postmortem-specimens.html. Coroners and medical examiners should follow this guidance in determining if an autopsy should be performed on the decedent and the protocol in place in collecting and submitting postmortem specimens.

Reporting of the Deaths Pending Final Investigation

If the coroner or medical examiner suspects COVID-19 but is awaiting laboratory results, the manner of death shall be reported as “pending investigation” and the immediate cause of death shall be reported as “Pending Investigation – Suspected COVID-19 Pending Laboratory Confirmation”.

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\(^5\) Id. at § 450.504.
Reporting Final Cause of Death

Within 24 hours of the receipt of laboratory results confirming COVID-19, the report of death shall be amended in EDRS. For public health surveillance purposes, it is important to emphasize that COVID-19 must be reported as the cause of death where Coronavirus Disease 2019 caused or is assumed to have caused or contributed to the death. This is consistent with terminology used by the World Health Organization (WHO).

Proper specification and detail of the chain of events leading to death in Part I of the report of death is also important. For example, in cases where COVID-19 causes pneumonia and fatal respiratory distress, both pneumonia and respiratory distress should be included along with COVID-19 in Part I as shown below.

Coroners and medical examiners should include as much detail as possible based on their knowledge of the case, review of medical records, laboratory testing results, etc. If the decedent had other chronic conditions such as COPD or asthma that may have also contributed, these conditions must be reported in Part II.

If another strain of coronavirus caused the death, the coroner or medical examiner must record the strain of coronavirus (such as Human coronavirus OC43, Middle East respiratory syndrome coronavirus, etc.) in Part I.
Final Manner of Death
At the conclusion of the coroner’s or medical examiner’s investigation, the manner of death shall be reported as “Natural” unless circumstances surrounding the death suggest that the death was sudden, violent, suspicious in nature, or was the result of other than natural causes.

EDRS Training
For more information on EDRS including training materials and upcoming training webinars, visit the EDRS website at [www.doh.pa.gov/edrs](http://www.doh.pa.gov/edrs).

Contact Information for EDRS User Support and the Death Registry Unit:

By Phone: Vital Events Stakeholder Hotline at 800-323-9613

By Email: EDRS User Account Creation: [RA-DHEDRSUSERACCT@pa.gov](mailto:RA-DHEDRSUSERACCT@pa.gov)
EDRS Support: [RA-DHEDRS@pa.gov](mailto:RA-DHEDRS@pa.gov)
Death Registration: [RA-DHDEATHREG@pa.gov](mailto:RA-DHDEATHREG@pa.gov)