

**Ministry of Health**

Office of Chief Medical Officer of Health, Public Health  
Box 12,  
Toronto, ON M7A 1N3

Tel.: 416 212-3831  
Fax: 416 325-8412

**Ministère de la Santé**

Bureau du médecin hygiéniste en chef, santé publique  
Boîte à lettres 12  
Toronto, ON M7A 1N3

Tél. : 416 212-3831  
Télééc. : 416 325-8412

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

....2

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](#).

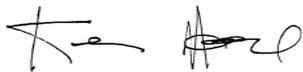
When there was a clear alternative cause of death, e.g, trauma, drug toxicity, other natural death process, at a time that the person was COVID-19 test positive but did not have a clinically compatible illness, COVID-19 should not be provided as the Immediate or Antecedent cause of death.

**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