

STATE REGISTRAR NOTICE

Subject:	Type:	Number:
Amending Death Records	□ Regular □ Transitory	2020-17
Date Issued: July 1, 2020 Date Effective: July 1, 2020	Audience: All Death Stakeholders	By Direction of: Audrey Marrocco State Registrar

This State Registrar Notice (SRN) discusses processes for amending a death record filed with Pennsylvania's Vital Records Program.

Background

Since the onset of the vital records program in Pennsylvania, there have been various processes used to amend death records after the initial report of death has been filed. While the goal remains to accurately report information at the time of initially reporting the death, there are situations where the death record must be amended after the original registration of the death.

The process to amend paper-reported death records has remained relatively unchanged for decades. This amendment process is highly reliant on manual processes to physically move a sheet of paper across several organizations until it is finally received and processed by the Bureau of Health Statistics and Registries (BHSR). This process is inefficient and sometimes ineffective in providing BHSR with the death amendment information needed to update the death record. These manual processes inherently cause time delays that negatively impact the timely reporting of death data needed for public health purposes and for issuing updated death certificates to family members and other eligible applicants.

On September 20, 2019, the Bureau of Health Statistics and Registries issued <u>SRN 2019-12</u>, <u>Follow-up with Coroners and Medical Examiners for Pending Manners and Causes of Death</u>. The focus of this State Registrar Notice (SRN) was to launch an initiative to follow up on cases where the manner and/or cause of death was listed as pending. During this initiative, BHSR worked with coroners and medical examiners to determine cases that were still outstanding in their systems as compared to PA's Death Registry.

While the immediate goal of this initiative was to amend outstanding death records where the manner and/or cause was initially reported as pending, BHSR received suggestions and feedback from many stakeholders requesting that BHSR streamline the process to amend paper-reported death records. This SRNs outlines this streamlined process as well as includes instructions on how to amend a death record which was initially reported through the Electronic Death Registration System (EDRS).

What is EDRS

EDRS enables death reporting stakeholders (i.e., funeral homes, coroner and medical examiner offices, and physicians) to complete a Report of Death through a secured website instead of on paper. Electronic reporting of deaths is a nation-wide initiative to improve the timeliness and quality of data surrounding deaths in our nation.

EDRS provides the Department of Health with "near time" death reporting as compared to the three-month delay associated with paper reported deaths. This rapid reporting of death data is crucial to the Commonwealth and our nation in notification of and responding to public health issues including epidemics and natural disasters.

Amending Paper Reported Deaths

<u>Historical Methods of Requesting Amendments to Death Records</u> – For decades, there have been three general processes to amend a death record after the initial reporting of the death. One of the most common methods used has been to submit the "Certificate of Death (H105.143)" paper reporting form. This process is commonly used when reporting the final cause and manner of death to a report that was initially filed with the manner and/or cause listed as pending. While this process enables local registrars to immediately issue certified copies for the updated death certificate, this process is highly inefficient and prone to reporting errors. Due to the manual process of reporting these amendments, updated reports become misplaced, unfiled, or are filed without referencing the fact that this paper report is replacing a report previously filed as pending.

In addition, BHSR is required to do a full review and comparison of the data reported on the initial report versus the updated report to identify the information that has been amended and to ensure that the information is amended in accordance with the Vital Statistics Law of 1953. This process is inefficient and often takes weeks to accomplish due to the need for the paper-reported information to physically pass through numerous hands until it is received by BHSR for analysis.

The other two methods of amending death records have been to submit a death correction form or for a medical certifier to submit a letter to BHSR describing the necessary amendments to the death record. These methods also have inherent inefficiencies and often require multiple interactions between BHSR and the requestor before the amendment is processed.

<u>Acceptable Methods of Requesting Amendments to Death Records</u> – The following changes to amendment requests process are now in effect:

- 1. BHSR is releasing the following new death amendment forms which should be used to request amendments to death records that were originally reported on paper. These new forms have been designed to simplify the death amendment request process by capturing the specific fields that each stakeholder may legally amend on a death record. The forms are as follows:
 - Request to Amend a Death Record by the Funeral Director
 - Request to Amend the Medical Information on a Death Record Certified by a Medical Professional
 - Request to Amend the Medical Information on a Death Record Certified by a Coroner or Medical Examiner

Please note that Part 1 of each form must be completed in its entirety to ensure that we identify the correct death record that needs amended. When completing Part 2 of the form, only enter the information that you are requesting to be amended. Do not enter data into fields that are to remain as initially reported. The recommended method to submit a death amendment form to BHSR is by fax at 717-265-7371.

Once BHSR accepts the amendment request, they will enter the amendment into EDRS, which is the official repository for all death records filed in Pennsylvania.

- 2. BHSR will be phasing out the process of submitting a new "Certificate of Death (H105.143)" paper reporting form to replace or request an amendment to the original death record. While BHSR will continue to accept amendments using this method through December 31, 2020, we will be working with various stakeholders to transition them to reporting through EDRS and then using EDRS to amend the death record, or to use our new death amendment forms to modify a death record that was reported on paper.
- 3. BHSR will no longer accept the historic death correction form or a letter from the medical certifier requesting the necessary amendment to the death record.

Amending Electronic Reported Deaths

The amendment process in EDRS is streamlined and enables each reporting entity to submit an amendment request directly through EDRS to BHSR.

Please see the following Quick Reference Sheets for instructions:

- Funeral Directors
 - o QRS-2022-FH Amending a Death Case: Personal

- Medical Professionals
 - o QRS-2021-MC Amending a Death Case: Replacement Medical
 - o QRS-2022-MC Amending a Death Case: Medical
- Coroners and Medical Examiners
 - o QRS-2021-CME Amending a Death Case: Replacement Medical (Pending to Final)
 - o QRS-2022-FH Amending a Death Case: Personal
 - o QRS-2022-MC Amending a Death Case: Medical
- All Stakeholders
 - o <u>QRS-2024 Editing an Amendment Request</u>
 - o QRS-2034 Viewing the Processing History of an Amendment

Please note that a licensed healthcare facility must provide information to BHSR if the medical professional requesting the amendment is not the same medical professional that originally certified the death. Per the Vital Statistics Law, the original medical certifier should be the individual requesting the amendment to the death record. BHSR will accept a medical amendment from a different medical professional at the facility only in situations where the original medical professional is no longer available to submit the amendment request.

Stakeholders should not create a second case in EDRS to report amendments to a record which was reported on paper. Creating a second case could result in a duplicate case. BHSR will reject any duplicate cases submitted into EDRS. Therefore, reports submitted electronically must be amended electronically, and reports submitted on paper must be amended on paper.

Amending Hybrid Reported Deaths

Hybrid deaths records refer to records where the funeral director reported electrically while the medical certification was done on paper, or vice versa. To amend a hybrid death record, the portion reported through EDRS must be amended through EDRS. The portion reported on paper must be amended on paper.

Please note that stakeholders are only able to access death records that they electronically reported in EDRS.

Obtaining Updated Death Certificates

Individuals that used EDRS to report the death may view the record in EDRS to verify that the record has been amended before requesting updated death certificates. Funeral directors that reported the death on paper may call the Vital Events Stakeholder Hotline or the local registrar that registered the paper record to verify if the death record has been amended prior to requesting updated death certificates.

Local registrars are able to view all death records for their district in EDRS even if the record was originally reported on paper. Please note that deaths reported on a "Certificate of Death (H105.143)" paper reporting form may take three to four months before the local registrar is able to view the death record within EDRS. This time delay is due to delays in the manual processes of receiving paper reported deaths and in uploading the information by BHSR into EDRS. All records must first be entered into EDRS before the amended information is updated on the record.

When issuing updated death certificates where a death amendment form or EDRS was used to submit the amendment, the local registrars should issue the death certificate using the vault copy available in EDRS after the amendment has been processed by BHSR. Local registrars may continue to issue certified copies for those deaths where the amendment was reported by resubmitting a new "Certificate of Death (H105.143)" paper reporting form.

Actions Stakeholders Can Take Now

Stakeholders who have not yet adopted EDRS are encouraged to do so. Training is currently provided through a one-hour webinar. Visit the "EDRS Training Opportunities" section of our EDRS website at www.doh.pa.gov/edrs for upcoming training dates. Prior to signing up for training, please register for an EDRS account. Details on "How to Register for an EDRS Account" are also located at www.doh.pa.gov/edrs.

Continued training support is also available to those organizations that have already adopted EDRS. Stakeholders are also encouraged to attend the standard one-hour webinar or to contact our Vital Events Stakeholder Hotline to discuss your organization's specific training needs.

If you would like to host a training event at an association meeting in your area or would prefer a personalized training for your facility, please contact us to coordinate a date and time for the training event.

Fax Number to Submit Death Amendment Forms: 717-265-7371

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

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

By Email: EDRS Support: RA-DHEDRS@pa.gov

EDRS User Account Creation: RA-DHEDRSUSERACCT@pa.gov