

INDIANA COURT OF APPEALS AFFIRMS REGULAR COMMITMENT OF M.M. FOR GRAVE DISABILITY

In Re: Commitment of M.M., (24A-MH-2046), the Indiana Court of Appeals (the "Court") upheld the trial court's order indefinitely committing M.M., ruling that sufficient evidence supported the finding that M.M. was gravely disabled. The decision underscores the legal standards for civil commitments and highlights the role of patient insight and independent functioning in determining grave disability.

BACKGROUND

M.M., diagnosed with schizoaffective disorder, arrived at the mental health facility in July 2024 with stab wounds and severe psychiatric symptoms. She exhibited signs of a manic and psychotic episode, displayed disorganized speech and thought patterns and refused to take prescribed medications. After an emergency detention, the facility sought regular commitment because M.M. was gravely disabled due to her inability to function independently and her refusal to acknowledge her illness.

COURT'S ANALYSIS OF GRAVE DISABILITY

The Court found clear and convincing evidence that M.M. met the standard for grave disability based on several factors. First, M.M. consistently denied having a mental illness despite a history of prior commitments, refused injectable medications and initially resisted oral medications. Additionally, M.M. could not articulate a viable plan for safe discharge, like stable housing or an effective strategy for self-care. Finally, the Court determined that M.M.'s head injuries were, according to her psychiatrist, linked to her untreated mental illness, indicating a significant risk of self-harm if she were discharged.

The Court rejected M.M.'s argument that her testimony about having housing plans and financial resources contradicted her grave disability, emphasizing that the Court does not reweigh the evidence presented in commitment hearings.

PRACTICAL TAKEAWAYS

- **Trial Courts Must Determine Weight and Credibility of Patient's Testimony:** Courts are not required to accept a patient's claims about their mental condition as fact, especially when medical testimony and prior history suggest otherwise. Further, the Court of Appeals will defer to the trial court's determinations of weight and credibility.
- **Medication Adherence, Insight and Treatment History Matter:** A patient's refusal to acknowledge their illness or accept treatment can support a finding of grave disability. Additionally, the trial court can consider the patient's history of repeated hospitalizations and prior involuntary commitments and historical improvement during periods of compliance.

If you have questions or would like more information about this topic, please contact:

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