

INDIANA COURT OF APPEALS AFFIRMS FINDING OF GRAVE DISABILITY DESPITE INITIAL ADMISSION FOR FOOT PAIN

The Indiana Court of Appeals (the "Court") affirmed a trial court's determination that a patient was gravely disabled—even though he initially sought care for a physical ailment. The Court held that the patient's refusal of necessary treatment, combined with his lack of insight into both his medical and psychiatric conditions, satisfied the clear-and-convincing-evidence standard. *In re Commitment of G.N.*, 2025 WL 3633080, No. 25A-MH-1576, at *1 (Ind. Ct. App. Dec. 15, 2025) (unpublished).

BACKGROUND

In May 2025, G.N. presented to the hospital complaining of foot pain. Physicians later diagnosed an infection. Although G.N. initially accepted IV antibiotics, he refused oral antibiotics and declined surgery. A psychiatric evaluation followed, which revealed schizophrenia. The hospital petitioned for involuntary commitment.

At the hearing, G.N.'s psychiatrist testified that G.N. believed he possessed healing powers and could cure himself by "urin[at]ing on his toes." The psychiatrist also testified that G.N. bathed himself in bleach while hospitalized, lacked a reliable source of shelter or income, refused treatment for a potentially life-threatening infection and likewise refused medication for his mental illness. G.N. also had a history of psychiatric hospitalization. In the psychiatrist's view, G.N. was gravely disabled and had a poor prognosis without inpatient care.

The trial court granted the petition. G.N. appealed, asserting he was not gravely disabled because he sought treatment voluntarily, showed no signs of malnourishment and complied with some care. The Court rejected the argument.

ANALYSIS

Indiana requires petitioning providers to prove, by clear and convincing evidence, that the patient is mentally ill and either dangerous or gravely disabled. *I.C. § 12-26-6-8*. Indiana further defines a "gravely disabled" individual as one who, because of mental illness, is in danger of harm due either to an inability to provide for basic needs or to a substantial impairment in judgment that renders the patient unable to function independently. *I.C. § 12-7-2-96*.

The Court found the record supported both statutory prongs. G.N. refused medication, rejected his diagnosis and claimed that urinating on his foot would cure the infection. He lacked housing and income and engaged in dangerous behavior, including bathing in bleach. This evidence showed a profound lack of insight and an inability to appreciate the seriousness of his condition. Therefore, the Court concluded that clear and convincing evidence supported the finding of grave disability.

PRACTICAL TAKEAWAYS

- **Initial Patient Complaint Is Not Determinative:** A patient's reason for presenting to the hospital does not limit a court's ability to find grave disability if mental illness later becomes apparent.
- **Voluntary Admission Is Not Dispositive:** A patient who voluntarily seeks care may still be subject to involuntary commitment if they refuse necessary treatment and meet the statutory standard.

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

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