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Pa. Supreme Court clarifies scope of MHPA immunity

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The Supreme Court of Pennsylvania issued a decision on Thursday, October 23, 2025, clarifying the scope of a healthcare provider's immunity under the Mental Health Procedures Act (MHPA).

Wunderly v. St. Luke's Hospital of Bethlehem arose from a wrongful death and survival action asserting claims of negligence against St. Luke's Hospital and its affiliates related to the care and treatment of a patient who was involuntarily admitted under Sections 302 and 303 of the MHPA for dementia-related aggression. During his inpatient stay, the patient developed pressure-related skin breakdown, including new pressure wounds and deterioration of existing ones, which allegedly contributed to his physical decline and death.

The appellant argued that MHPA immunity did not apply because the claims were unrelated to mental health treatment. However, the court interpreted the statutory definitions of "treatment" and "adequate treatment" under Section 104 of the MHPA to include medical care necessary to maintain safe and healthful living conditions. It held that MHPA immunity extends beyond mental health-specific interventions to encompass coincident medical care – such as wound treatment – *when foreseeably connected to the patient's mental health condition and inpatient status.*

The majority opinion, authored by Justice Sallie Updyke Mundy, emphasized that trial courts must assess the connection between medical and mental health treatment on a case-by-case basis, noting that immunity does not apply where the link is too tenuous.

Ultimately, the majority found the pressure ulcers to be a foreseeable complication of inpatient mental health treatment, placing the hospital's care within the scope of MHPA immunity.

In dissent, Justice Christine Donohue, joined by justices Kevin M. Dougherty and Daniel D. McCaffery, argued that the ulcers arose independently of the mental health treatment and did not facilitate recovery from mental illness. The dissent warned that the majority's interpretation was "a bridge too far" and risked lowering the standard of care for patients with mental health conditions.

Implications for Hospitals and Providers

Healthcare providers treating patients with mental illness – particularly those admitted involuntarily – may now have stronger protection against negligence claims tied to medical or nursing care that occurs alongside psychiatric treatment. Because the connection between a patient's mental health condition and the medical treatment at issue is not always clear, the importance of detailed documentation is heightened. To maximize protection under the MHPA, providers should ensure that the record clearly reflects how physical and mental health care are coordinated and managed.

If you have any questions about the application of the MHPA, please contact Dan Ferhat or any member of the Saxton & Stump Healthcare Litigation Group.

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