

Part 4: Causation | Med Mal 101

APRIL 1, 2026

Med Mal 101: Back to Basics is 12-part series produced by Friday, Eldredge & Clark. Written by the attorneys in the Medical Malpractice Group, the content is designed to give physicians and other healthcare providers information they need to know about malpractice litigation.

In Arkansas, when a patient sues a medical care provider, the patient has the burden of proving: (1) the standard of care that was required of the medical care provider, (2) that the provider failed to act in accordance with that standard, and (3) that as a proximate result of a failure to act in accordance with that standard, the patient suffered injuries that would not otherwise have occurred.^[1] The standard of care element was discussed in [Part 3 of this series](#).

As discussed previously, all three elements are required. To recover damages, a plaintiff must prove not only that a medical care provider breached the applicable standard of care but must also show that the provider's breach proximately caused the plaintiff's injuries. Proximate cause is defined as "that which in a natural and continuous sequence, unbroken by any efficient intervening cause, produces the injury and without which the result would not have occurred."^[2] The plaintiff's proof must therefore demonstrate that "but for" the medical provider's negligence, the plaintiff's injury or death would not have occurred.^[3]

When an undesirable medical outcome occurs, one cannot assume that it was due to a breach of the standard of care. On the contrary, it is not unusual for a particular treatment to fail, or for a patient to experience surgical complications or side effects from medication, for example. Unless the outcome would not have occurred "but for" a breach of the standard of care, there is no malpractice. A plaintiff in a medical malpractice case, therefore, has the burden of proving, to "a reasonable degree of medical certainty or probability," that the injury would not have occurred "but for" the breach of the standard of care.^[4]

The information was written by the attorneys in the [Medical Malpractice Group](#) at Friday, Eldredge & Clark, LLP. This is not a substitute for legal advice and should be considered for general guidance only. For more information or if you have further questions, please contact one of our [Medical Malpractice Attorneys](#).

^[1] Ark. Code Ann. § 16-114-206(a).

^[2] *Dodd v. Sparks Reg'l Med. Ctr.*, 90 Ark. App. 191, 200, 204 S.W.3d 579, 585 (2005).

^[3] *Id.* (citing *Ford v. St. Paul Fire & Marine Ins. Co.*, 339 Ark. 434, 437, 5 S.W.3d 460, 463 (1999)).

^[4] *Ford*, 339 Ark. at 437, 5 S.W.3d at 463.

SUMMARY

April 1, 2026 In Arkansas, a medical malpractice claim requires more than proof of a breach in the standard of care, plaintiffs must also establish causation. This article explains how courts define "proximate cause," including the requirement that an injury would not have occurred "but for" the provider's actions, and why this element is often central to the outcome of a case.

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Authors



Tyler D. Bone

PARTNER

📍 LITTLE ROCK

📞 501-370-3348

✉️ tbone@fridayfirm.com



Michelle Ator

PARTNER

📍 LITTLE ROCK

📞 501-370-3319

✉️ mator@fridayfirm.com