

ARE YOU READY? NEW ACCESSIBILITY RULES FOR MEDICAL DIAGNOSTIC EQUIPMENT

March 31, 2026

On July 8, 2024, the Department of Health and Human Services (HHS) issued a final rule updating the regulations for Section 504 of the Rehabilitation Act of 1973 ([45 CFR Part 84](#)). These updates are designed to ensure that individuals with disabilities have equal access to medical care and diagnostic services. As full enforcement of these new standards is set to begin on July 8, 2026, the implementation window for providers and entities to meet these mandatory requirements is now closing.

These requirements apply to all programs and activities that receive "Federal financial assistance" from HHS and to recipients that operate, or that received Federal financial assistance for the operation of, such programs or activities. ([45 CFR § 84.90](#)). This includes, but is not limited to, private physician offices, clinics, hospitals, and outpatient facilities that accept Medicare or Medicaid payments.

New Requirements for Medical Diagnostic Equipment (MDE)

Under the new [Subpart J](#), entities are required to ensure that their programs and activities, when viewed in their entirety, are readily accessible to and usable by individuals with disabilities.

[Technical Standards for Accessibility](#). Medical Diagnostic Equipment, including examination tables, dental chairs, weight scales, and radiological equipment, must meet specific accessibility standards. For equipment requiring a transfer from a wheelchair, the equipment must feature an adjustable low-transfer height between 17 and 19 inches.

[Scoping Requirements \(Quantity\)](#). At least 10% of the total number of units of each type of equipment (but no fewer than one unit) must meet the Standards for Accessible MDE. ([45 CFR § 84.92\(b\)](#)).

- **Specialized Facilities:** Facilities that specialize in treating conditions that affect mobility (e.g., rehabilitation or physical therapy centers) must ensure at least 20% of each type of equipment is accessible.

Compliance Timelines

[New Acquisitions \(Effective July 8, 2024\)](#). Every piece of MDE purchased, leased, or renewed after the final rule's effective date must meet accessibility standards until the 10 percent (or 20 percent) scoping requirement is satisfied ([45 CFR § 84.92\(a\)](#)).

[Baseline Requirement \(Deadline: July 8, 2026\)](#). Regardless of current inventory or purchase plans, every covered entity must have at least one accessible examination table and one accessible weight scale in place by July 8, 2026 ([45 CFR § 84.92\(c\)](#)).

Note: If a facility claims compliance under the July 8, 2026, baseline requirement of at least one accessible unit, it remains under an ongoing obligation to apply the "new acquisition" rule to all equipment purchased, leased, or renewed after July 8, 2024, until the facility reaches its full 10% or 20% scoping requirement.

Staff Obligations and Operational Impact

Ownership of accessible equipment alone is insufficient for compliance. Entities must also ensure:

- **Staff Training:** Personnel must be trained to operate accessible MDE and assist with safe patient transfers ([45 CFR § 84.94](#)).
- **Program Accessibility:** Entities may not deny services to a patient because accessible equipment is currently unavailable in a specific room. Scheduling and inventory management must prioritize "meaningful access" for all patients.

If you have any questions or need further guidance regarding the Final Rule, please contact a member of Hancock Daniel's [Compliance](#) team.

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