Client Brief
March 18, 2026

Topic: Patients with disabilities and Section 504

Background: Medical practices have been subject to Title III of the Americans with Disabilities Act (the "ADA") and Section 504 of the Rehabilitation Act ("Section 504") for many years. Title III of the ADA became effective in 1992, and Section 504 became effective in 1973. The Office for Civil Rights (OCR), however, updated Section 504 in 2024 with a finalized rule titled "*Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance*" (the "Section 504 Final Rule"). The Section 504 Final Rule clarifies and strengthens civil rights protections for people with disabilities, addresses discrimination in medical treatment, adds enforceable standards for accessible medical diagnostic equipment, and ensures accessible web content and mobile apps.

In short, both the ADA and Section 504 require private medical practices to provide equal access and reasonable accommodations for patients with disabilities, prohibiting discrimination in medical care. The ADA covers all public/private practices, regardless of funding, while Section 504 applies only to programs receiving federal funding (including Medicare/Medicaid).

As an aside, Section 1557 of the Affordable Care Act of 2010 also addresses patients with disabilities - specifically, communication disabilities such as hearing impairment, visual impairment, etc. - and requires covered entities to take appropriate steps to ensure that communications with these individuals are as effective as communication with others. This Brief, however, focuses only on Section 504.

What's required: Among other things, when a medical practice utilizes Medical Diagnostic Equipment ("MDE")[1], at least 10 percent of the total number of units, but no fewer than one unit, of each type of equipment in use must meet the Standards for Accessible MDE.[2]

Upcoming deadline: By July 8, 2026, medical practices "*...shall, subject to the requirements and limitations set forth in this section, purchase, lease, or otherwise acquire the following, unless the recipient already has them in place: (1) At least one examination table that meets the Standards for Accessible MDE[3], if the recipient uses at least one examination table; and (2) At least one weight scale that meets the Standards for Accessible MDE, if the recipient uses at least one weight scale*."[4]

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[1] "Equipment used in, or in conjunction with, medical settings by health care providers for diagnostic purposes. MDE includes, for example, examination tables, examination chairs (including chairs used for eye examinations or procedures, and dental examinations or procedures), weight scales, mammography equipment, x-ray machines, and other radiological equipment commonly used for diagnostic purposes by health professionals." 45 CFR § 84.10
[2] 45 CFR § 84.92 (b)(1)
[3] *See* 36 CFR part 1195; *Exhibit A*
[4] 45 CFR § 84.92 (c)(1) and (2)

What's not required:

Taking any action that you can demonstrate would result in a fundamental alteration in the nature of a program or activity, or in undue financial and administrative burdens.[5] If you believe compliance would result in undue financial and administrative burdens, you have the burden of proving that compliance with [the exam table and weight scale requirements] would result in such alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the head of the recipient or their designee after considering all resources available for use in the funding and operation of the program or activity and must be accompanied by a written statement of the reasons for reaching that conclusion. If an action would result in such an alteration or such burdens, the recipient shall take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the recipient.[6]

A recipient meets its burden of proving that compliance with [the exam table and weight scale requirements] would result in a fundamental alteration under the above paragraph if it demonstrates that compliance would alter diagnostically required structural or operational characteristics of the equipment, and prevent the use of the equipment for its intended diagnostic purpose. This does not excuse compliance with other technical requirements where compliance with those requirements does not prevent the use of the equipment for its diagnostic purpose.[7]

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[5] 45 CFR § 84.92 (e)
[6] Id.
[7] Id.

Exhibit A

36 CFR part 1195 [partial] (emphasis added)

M301 Diagnostic Equipment Used by Patients in Supine, Prone, or Side-Lying Position

M301.1 General. Diagnostic equipment that supports patients in a supine, prone, or side-lying position shall comply with M301.

Exception: Examination chairs complying with M302 that recline to facilitate diagnosis after patients transfer onto the chair shall not be required to comply with M301.

M301.2 Transfer Surface. A transfer surface shall be provided and shall comply with M301.2.

M301.2.1 Adjustability. Transfer surfaces shall be adjustable in height measured from the floor to the top of the uncompressed transfer surface and shall provide the following:

A. A low transfer position at a height of 17 inches (430 mm);

B. A high transfer position at 25 inches (635 mm); and

C. At least 4 additional transfer positions located between the low and high transfer positions and separated by 1 inch (25 mm) minimum.

M301.2.2 [Reserved]

M301.2.3 Size. The size of the transfer surface shall comply with M301.2.3.1 or M301.2.3.2. The size of transfer surfaces shall be measured from center points of their opposing sides.

M301.2.3.1 End Transfer Surface. End transfer surfaces shall be 28 inches (710 mm) wide minimum and 17 inches (430 mm) long minimum.

Exception: Transfer surfaces for imaging equipment with bores shall be permitted to be 21 inches (535 mm) wide minimum but shall not be permitted to be less than the full width of the examination surface provided for the patient.

M301.2.3.2 Side Transfer Surface. Side transfer surfaces shall be 28 inches (710 mm) wide minimum and 28 inches (710 mm) long minimum.

Exception: Transfer surfaces for imaging equipment with bores shall be permitted to be 21 inches (535 mm) wide minimum but shall not be permitted to be less than the full width of the examination surface provided for the patient.

M301.2.4 Unobstructed Transfer. Each transfer surface shall provide two unobstructed sides for patient transfer.

Exceptions: 1. Obstructions no more than 3 inches (75 mm) deep shall be permitted to extend beyond transfer sides of transfer surfaces provided that such obstructions do not protrude above the tops of transfer surfaces.

2. Temporary obstructions shall be permitted provided that they can be repositioned during transfer to comply with M301.2.4, including Exception 1.

M301.3 Supports. Transfer supports, leg supports, and reclining surfaces shall comply with M301.3.

M301.3.1 Transfer Supports. Transfer surfaces required by M301.2 shall provide transfer supports and shall comply with M305.2.

M301.3.2 Leg Supports. Where stirrups are provided, leg supports shall also be provided and shall comply with M305.4.

M301.3.3 Head and Back Support. Where the diagnostic equipment is used in a reclined position, head and back support shall be provided and shall comply with M305.5.

M301.4 Lift Compatibility. Diagnostic equipment shall be usable with portable patient lifts and, when in use with such lifts, shall comply with M301.4.1 or M301.4.2.

Exception: Where fixed overhead patient lifts are provided, and when their use with diagnostic equipment is permitted by an enforcing authority, diagnostic equipment shall not be required to meet the lift compatibility requirements of this section provided that such equipment is clearly labeled as not compatible with portable floor lifts.

M301.4.1 Clearance in Base. The base of diagnostic equipment shall provide a clearance 39 inches (990 mm) wide minimum, 6 inches (150 mm) high minimum measured from the floor, and 36 inches (915 mm) deep minimum measured from the edge of the examination surface. Where the width of examination surfaces is less than 36 inches (915 mm), the clearance depth shall extend the full width of the equipment. Components of diagnostic equipment are permitted to be located within 8 inches (205 mm) maximum of the centerline of the clearance width.

M301.4.2 Clearance Around Base. The base of diagnostic equipment shall provide a clearance 6 inches (150 mm) high minimum measured from the floor and 36 inches (915 mm) deep minimum measured from the edge of the examination surface. The width of the base permitted within this clearance shall be 26 inches (660 mm) wide maximum at the edge of the examination surface and shall be permitted to increase at a rate of 1 inch (25 mm) in width for each 3 inches (75 mm) in depth.

M302 Diagnostic Equipment Used by Patients in Seated Position

M302.1 General. Diagnostic equipment that supports patients in a seated position shall comply with M302.

Exception: Where weight scales contain wheelchair spaces complying with M303 and also provide a seat integral to the equipment, the scales shall not be required to comply with M302.

M302.2 Transfer Surface. A transfer surface shall be provided and shall comply with M302.2.

M302.2.1 Adjustability. Transfer surfaces shall be adjustable in height measured from the floor to the top of the uncompressed transfer surface and shall provide the following:

A. A low transfer position at a height of 17 inches (430 mm);

B. A high transfer position at 25 inches (635 mm); and

C. At least 4 additional transfer positions located between the low and high transfer positions and separated by 1 inch (25 mm) minimum.

M302.2.2 [Reserved]

M302.2.3 Size. Transfer surfaces shall be 21 inches (610 mm) wide minimum and 17 inches (430 mm) deep minimum. The size of transfer surfaces shall be measured from center points of their opposing sides.

M302.2.4 Transfer Sides. Options to transfer from a mobility device shall be provided on two adjoining sides of transfer surfaces.

Exception: Options to transfer to or from a mobility device onto opposing sides of transfer surfaces shall be permitted where the transfer surface is obstructed by fixed footrests.

M302.2.5 Unobstructed Transfer. Each transfer side complying with M302.2.4 shall provide unobstructed access to transfer surfaces.

Exceptions: 1. Obstructions no more than 3 inches (75 mm) deep shall be permitted to extend beyond transfer sides of transfer surfaces provided that such obstructions do not protrude above the tops of transfer surfaces.

2. Temporary obstructions shall be permitted provided that they can be repositioned during transfer to comply with M302.2.5, including Exception 1.

M302.3 Supports. Transfer supports, leg supports and reclining surfaces shall comply with M302.3.

M302.3.1 Transfer Supports. Transfer supports shall be provided for use with transfer sides required by M302.2.4 and shall comply with M305.2.1.1, M305.2.2.1, and M305.2.3 through M305.2.8.

M302.3.2 Leg Supports. Where stirrups are provided, leg supports shall also be provided and comply with M305.4.

M302.3.3 Head and Back Support. Where the diagnostic equipment is used in a reclined position, head and back support shall be provided and shall comply with M305.5.

M302.4 Lift Compatibility. Diagnostic equipment shall be usable with portable patient lifts and, when in use with such lifts, shall comply with M302.4.1 or M302.4.2.

Exception: Where fixed overhead patient lifts are provided, and when their use with diagnostic equipment is permitted by an enforcing authority, diagnostic equipment shall not be required to meet the lift compatibility requirements of this section provided that such equipment is clearly labeled as not compatible with portable floor lifts.

M302.4.1 Clearance in Base. The base of the diagnostic equipment shall provide a clearance 39 inches (990 mm) wide minimum, 6 inches (150 mm) high minimum measured from the floor, and 36 inches (915 mm) deep minimum measured from the edge of the examination surface. Where the width of the examination surface is less than 36 inches (915 mm), the clearance depth shall extend the full width of the equipment. Equipment components are permitted to be located within 8 inches (205 mm) maximum of the centerline of the clearance width.

M302.4.2 Clearance Around Base. The base of the diagnostic equipment shall provide a clearance 6 inches (150 mm) high minimum measured from the floor and 36 inches (915 mm) deep minimum measured from the edge of the examination surface. The width of the base permitted within this clearance shall be 26 inches (660 mm) wide maximum at the edge of the examination surface and shall be permitted to increase at a rate of 1 inch (25 mm) in width for each 3 inches (75 mm) in depth.

M303 Diagnostic Equipment Used by Patients Seated in a Wheelchair

M303.1 General. Diagnostic equipment used by patients seated in a wheelchair shall comply with M303.

M303.2 Wheelchair Spaces. Wheelchair spaces complying with M303.2 shall be provided at diagnostic equipment.

M303.2.1 Orientation. Wheelchair spaces shall be designed so that a patient seated in a wheelchair orients in the same direction that a patient not seated in a wheelchair orients when the diagnostic equipment is in use.

M303.2.2 Width. Wheelchair spaces shall be 36 inches (915 mm) wide minimum.

Exception: Wheelchair spaces located on raised platforms shall be permitted to be 32 inches (815 mm) wide minimum to a height of 4 inches (100 mm) measured from the platform surface.

M303.2.3 Depth. The depth of wheelchair spaces shall comply with M303.2.3.

M303.2.3.1 Front or Rear Entry. Where wheelchair space entry and exit is provided at only one end (front or rear) the wheelchair space shall be 48 inches (1220 mm) deep minimum.

M303.2.3.2 Pass Through Entry. Where wheelchair space entry and exit permits pass through from one end to the other, the wheelchair space shall be 40 inches deep (1015 mm) minimum.

M303.2.3.3 Side Entry. Where wheelchair space entry is only from the side, the wheelchair space shall be 60 inches (1525 mm) deep minimum.

M303.2.4 Equipment Clearances. Where wheelchair spaces are entered from the rear and includes space beneath components, wheelchair spaces shall include knee and toe clearances complying with M303.2.4.1 for breast platforms and M303.2.4.2 for all other equipment.

M303.2.4.1 Breast Platforms. Wheelchair spaces beneath breast platforms shall comply with M303.2.4.1.

M303.2.4.1.1 Depth. Wheelchair spaces shall include knee and toe clearance 25 inches (635 mm) deep minimum and 28 inches (710 mm) deep maximum.

M303.2.4.1.2 Height. Wheelchair spaces shall include toe clearance 9 inches (230 mm) high minimum above the floor measured to a depth of 6 inches (150 mm) maximum from the toe end of the wheelchair space. Knee clearance shall be provided at a depth of 19 inches (485 mm) minimum and 22 inches (560 mm) maximum at 9 inches (230 mm) above the floor and at a depth of 16 inches (405 mm) minimum at 27 inches (685 mm) above the floor measured from the leading edge of the breast platform. Between 9 inches (230 mm) and 27 inches (685 mm) above the floor, the knee clearance shall be permitted to reduce at a rate of 1 inch (25 mm) in depth for every 6 inches (150 mm) in height.

Exception: Components shall be permitted to extend into the wheelchair space at a height of 1⁄2 inches (38 mm) maximum between 17 inches (430 mm) minimum and 25 inches (635 mm) maximum in depth measured from the leading edge of the breast platform. From 25 inches (635 mm) to 28 inches (710 mm) in depth the height of a component above 1⁄2 inches (38 mm) shall be beveled at a rate of 2.5:3 maximum.

M303.2.4.2 Other Equipment. Wheelchair spaces beneath diagnostic equipment other than breast platforms shall comply with M303.2.4.2.

M303.2.4.2.1 Depth. Wheelchair spaces shall include knee and toe clearance 17 inches (430 mm) deep minimum and 25 inches (635 mm) deep maximum.

M303.2.4.2.2 Height. Wheelchair spaces shall include toe clearance 9 inches (230 mm) high minimum above the floor measured to a depth of 6 inches (150 mm) maximum measured from the toe end of the wheelchair space. Knee clearance shall be provided at a depth of 11 inches (280 mm) minimum and 25 inches (635 mm) maximum at 9 inches (230 mm) above the floor and at a depth of 8 inches (205 mm) minimum at 27 inches (685 mm) above the floor measured from the leading edge of the equipment. Between 9 inches (230 mm) and 27 inches (685 mm) above the floor, the knee clearance shall be permitted to reduce at a rate of 1 inch (25 mm) in depth for every 6 inches (150 mm) in height.

M303.2.5 Surfaces. Wheelchair space surfaces shall not slope more than 1:48 in any direction.

M303.2.6 Edge Protection. Where wheelchair spaces are provided on a platform raised more than 1⁄2 inches (38 mm) in height, edge protection 2 inches (51 mm) high minimum measured from the surface of the platform shall be provided on each side not providing entry to or exit from the equipment.

M303.3 Entry. Where there is a change in level at the entry to wheelchair spaces, the change in level shall comply with M303.3.

M303.3.1 Vertical. Changes in level of

1⁄4 inch (6.4 mm) high maximum shall be permitted to be vertical.

M303.3.2 Beveled. Changes in level between

1⁄4 inch (6.4 mm) high and

1⁄2 inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

M303.3.3 Ramped. Changes in level greater than

1⁄2 inch (13 mm) high shall be ramped and shall comply with M303.3.3.

M303.3.3.1 Running Slope. Ramp runs shall have a running slope not steeper than 1:12.

Exception: A running slope not steeper than 1:8 shall be permitted for ramp runs with a maximum height of 21⁄2 inches (64 mm).

M303.3.3.2 Cross Slope. The cross slope of ramp runs shall not be steeper than 1:48.

M303.3.3.3 Clear Width. The clear width of ramp runs shall be 36 inches (915 mm) minimum.

M303.3.3.4 Edge Protection. Ramps with drop offs

1⁄2 inch (13 mm) or greater shall provide edge protection 2 inches (50 mm) high minimum on each side with a drop off.

M303.3.3.5 Handrails. Ramps with a rise greater than 6 inches (150 mm) shall provide handrails on both sides.

M303.4 Components. Where components of diagnostic equipment are used to examine specific body parts, the components shall be capable of examining the body parts of a patient seated in a wheelchair. Breast platforms shall comply with M303.4.1.

M303.4.1 Breast Platform Adjustability. Breast platforms shall be continuously adjustable from a low height of 26 inches (660 mm) to a high height of 42 inches (1065 mm) above the floor.

M304 Diagnostic Equipment Used by Patients in Standing Position

M304.1 General. Diagnostic equipment used by patients in a standing position shall comply with M304.

M304.2 Standing Surface. Equipment surfaces on which patients stand must comply with M304.2

M304.2.1 Slip Resistant. The surface on which the patient stands shall be slip resistant.

M304.2.2 Standing Supports. Standing supports shall be provided on two sides of the standing surface and shall comply with M305.3.

Exception: Diagnostic equipment with entry and exit permitting pass-through from one end to the other shall be permitted to provide one standing support on one side of the standing surface provided that the standing support complies with the requirements for standing supports in a horizontal position in M305.3.

M305 Supports

M305.1 General. Supports shall comply with M305.

M305.2 Transfer Supports. Transfer supports shall comply with M305.2.

M305.2.1 Location. Transfer supports shall comply with M305.2.1.1 or M305.2.1.2 and shall be located 11⁄2 inches (38 mm) maximum measured horizontally from the plane defined by the nearest edge of the transfer surface.

Exception: Where the support folds, collapses, or articulates, the transfer support shall be permitted to be located 3 inches (75 mm) maximum from the plane defined by the nearest edge of the transfer surface.

M305.2.1.1 End Transfer Supports. Transfer supports for transfer surfaces complying with M301.2.3.1 and M302.2 shall be located on the short side (length) opposite the transfer side.

M305.2.1.2 Side Transfer Supports. Transfer supports for transfer surfaces complying with M301.2.3.2 shall be capable of supporting transfer on each side of the transfer surface.

M305.2.2 Length. The length of transfer supports shall comply with M305.2.2.1 or M305.2.2.2.

M305.2.2.1 End Transfer Supports. Transfer supports for transfer surfaces complying with M301.2.3.1 and M305.2.2.1 shall be 15 inches (380 mm) long minimum. Transfer supports shall be positioned along 131⁄2 inches (345 mm) minimum of the depth of the transfer surface.

M305.2.2.2 Side Transfer Supports. Transfer supports for transfer surfaces complying with M301.2.3.2 shall be 28 inches (710 mm) long minimum and shall be positioned along the width of transfer surfaces.

Exceptions: 1. Where transfer surfaces are part of an articulating surface, the support shall be permitted to be 15 inches (380 mm) long minimum.

2. Where the width of an imaging bed is more than 24 inches (533 mm), transfer supports shall be permitted to be 12 inches (305 mm) long minimum.

M305.2.3 Height. During use, the tops of transfer support gripping surfaces shall be 6 inches (150 mm) minimum and 19 inches (485 mm) maximum higher than the top of the associated uncompressed transfer surface.

Exception: Where the width of the transfer surface for imaging beds exceed 24 inches (610 mm), the tops of the gripping surfaces shall be permitted to be 3 inches (75 mm) minimum and 6 inches (150 mm) maximum higher than the top of the associated uncompressed transfer surface.

M305.2.4 Cross Section. Transfer supports shall have a cross section complying with 305.2.4.1 or 305.2.4.2.

M305.2.4.1 Circular Cross Section. Transfer supports with circular cross sections shall have an outside diameter of 11⁄4 inches (32 mm) minimum and 2 inches (51 mm) maximum.

M305.2.4.2 Non-Circular Cross Section. Transfer supports with non-circular cross sections shall have a cross-section dimension of 2 inches (51 mm) maximum and a perimeter dimension of 4 inches (100 mm) minimum and 4.8 inches (120 mm) maximum.

M305.2.5 Surface Hazards. Transfer supports and surfaces adjacent to transfer supports shall be free of sharp or abrasive components and shall have eased edges.

M305.2.6 Gripping Surface. Transfer support gripping surfaces shall be continuous along their length and shall not be obstructed along their tops or sides. The bottoms of transfer support gripping surfaces shall not be obstructed for more than 20 percent of their length.

M305.2.7 Clearance. Clearance between the transfer support gripping surface and adjacent surfaces or obstructions shall be 11⁄2 inches (38 mm) minimum.

M305.2.8 Fittings. Transfer supports shall not rotate within their fittings when in place for transfer.

M305.3 Standing Supports. Standing supports shall provide continuous support throughout use of the diagnostic equipment and shall comply with M305.3.

M305.3.1 Length. The length of gripping surfaces for standing supports shall be based on the position of the standing supports in relation to the standing surfaces they serve. Horizontal standing support gripping surfaces shall comply

with M305.3.1.1, horizontal standing support gripping surfaces on diagnostic equipment containing a wheelchair space shall comply with M305.3.1.2 and, vertical standing support gripping surfaces shall comply with M305.3.1.3.

M305.3.1.1 Horizontal Position. The length of gripping surfaces on horizontal standing supports shall be 4 inches (100 mm) minimum except for diagnostic equipment containing a wheelchair space which shall comply with M305.3.1.2.

M305.3.1.2 Diagnostic Equipment Containing a Wheelchair Space. On diagnostic equipment containing wheelchair spaces with one entry that also serves as the exit, the length of the gripping surface of horizontal standing supports shall be equal to or greater than 80 percent of the overall length of the platform. On diagnostic equipment containing a wheelchair space and permitting pass-through from one end to the other, the length of the gripping surface on horizontal standing supports shall be at least equal to the length of the platform.

M305.3.1.3 Vertical Position. The length of the gripping surface on vertical standing supports shall be 18 inches (455 mm) minimum.

M305.3.2 Height. The height of gripping surfaces for standing supports shall be based on the position of the standing supports in relation to the standing surfaces they serve. Horizontal standing support gripping surfaces shall comply with M305.3.2.1 and vertical standing support gripping surfaces shall comply with M305.3.2.2.

M305.3.2.1 Horizontal Position. The height of the top of the gripping surface on horizontal standing supports shall be 34 inches (865 mm) minimum and 38 inches (965 mm) maximum above the standing surface.

M305.3.2.2 Vertical Position. The height of the lowest end of the gripping surface on vertical standing supports shall be 34 inches (865 mm) minimum and 37 inches (940 mm) maximum above the standing surface.

M305.3.3 Fittings. Standing supports shall not rotate within their fittings.

M305.4 Leg Supports. Leg supports shall provide a method of supporting, positioning, and securing the patient's legs.

M305.5 Head and Back Support. Where the diagnostic equipment is used in a reclined position, head and back support shall be provided. Where the incline of the back support can be modified while in use, head and back support shall be provided throughout the entire range of the incline.