



## *Appendix 5.7*

# *Accessible MDE Standards for Procurement and Replacement*

### Federal Standards for Accessible MDE, In Brief

To comply with the Standards for Accessible MDE, as mandated by federal regulations under Section 504 of the Rehabilitation Act, certain considerations must be made when purchasing or replacing certain medical diagnostic equipment. Healthcare organizations with accessible MDE procurement policies typically require any newly acquired MDE to meet the Standards for Accessible MDE unless:

1. Scoping is met per the Standards; or
2. A documented exception applies.\*

Under the Standards for Accessible MDE, **full scoping requirements** are:

1. **For most locations/units:** 10%, or at least 1, of each available piece of equipment must meet standards for accessibility for that equipment type.
2. **For locations that primarily treat mobility conditions** (such as but not limited to: Orthopedics, Physical Therapy and Rehabilitation, and Neurology): 20%, or at least 1, of each available piece of equipment must meet standards for accessibility for that equipment type.
  - a. If you do not know which locations primarily treat mobility conditions, you may need to assess rates of mobility in each clinic to understand where there are higher rates of mobility disabilities or patients who would benefit from accessible equipment, such as Geriatrics.

Technical requirements for each equipment type can be found on the [U.S. Access Board's website](#).<sup>↗</sup>

\*A **documented exception** applies when the provider proves compliance would, “alter diagnostically required structural or operational characteristics of the equipment and would prevent use of the equipment for its intended diagnostic purpose,” or, “result in...undue financial and administrative burden.”<sup>1</sup> In these situations, the provider is required to offer alternate accommodations to enable equal access to the equipment. See the “Using Alternate Methods or Accommodations” section below for an example.

*This document does not replace legal counsel. Work closely with your compliance, legal, risk, and facilities departments to ensure your specific legal obligations are met.*

### Standards for Procurement

This section outlines standards for determining whether a piece of equipment must be replaced with a new model, is “otherwise compliant” and may be modified with accessories, or when alternative accommodations may be used to facilitate equal access.

#### New Accessible MDE

Healthcare organizations must procure new accessible MDE when:

1. New equipment is needed for new construction, expansions, or renovations, until scoping requirements at that location are fully met; and
2. When purchasing or leasing new MDE to replace broken, non-compliant, or outdated MDE, until scoping is met, unless a documented exception applies.

New construction, expansions, renovations, or other building projects should be designed with accessibility in mind. For the purposes of this chapter, this will ensure spaces will be large enough to accommodate accessible MDE and the transfer/maneuver space around it. See *Chapter 6: Accessible Physical Structures and Features* for additional information.

#### Modifying Existing Equipment

Healthcare organizations can meet full compliance by modifying existing MDE that is “otherwise compliant”. Otherwise compliant means non-modifiable components of that equipment, such as the base unit of an exam table or the platform of a scale, meet the technical requirements set by the Standards for Accessible MDE. Examples of compatible accessories to modify otherwise compliant equipment include:

- For exam tables/chairs:
  - Patient support rails, transfer support rails, or other handrails
  - Knee crutches or caddies if stirrups are used
- For standing scales
  - Standing supports such as handrails
  - Slip-resistant material for the platform
  - Fold-down scale seats
- For wheelchair-accessible scales
  - Attachable ramps
  - Side rails/edge protection for the platform

- Slip-resistant material for the platform
- Handrails
- NOTE: These accessories may be packaged in an “after-market compliance kit”, if available.

### Using Alternate Methods or Accommodations

There are limited situations when MDE cannot be replaced or retrofitted.

Some types of radiology/imaging equipment cannot meet the Standards because of its functional design. For example, equipment like MRI beds cannot be made height-adjustable because parts of the imaging technology (used to scan the underside of a patient’s body) are embedded in the table’s surface.

In these cases, alternative accommodations or modifications must be employed to safely transfer patients and ensure equal access to the diagnostic equipment. Such accommodations may include:

- Ceiling-mounted lift
- Portable transfer lift
- Transfer board
- Portable x-ray or other imaging equipment

See [Chapter 3: Providing Accommodations](#)<sup>7</sup> for more information.

### Standards for Replacement

This section includes example protocols healthcare organizations can establish to initially comply with the Standards for Accessible MDE and maintain compliance overtime in **existing** locations.

#### Exam Tables/Chairs

**Initial Compliance:** At least one compliant examination table/chair in all locations where these are used.

**Maintaining Compliance:** When existing examination tables/chairs are replaced or leases are renewed, acquire additional compliant equipment until full scoping is met.

### Wheelchair Scales

**Initial Compliance:** At least one compliant wheelchair scale (or alternative method of obtaining accurate patient weight, such as exam tables with built-in platform scales) in all locations where any type of scale is used.

**Maintaining Compliance:** When existing scales of any type are replaced, acquire additional compliant wheelchair scales until full scoping is met.

*NOTE:* If scales meet standards for both wheelchair scales and standing scales, they can count towards compliance for both types of scales

### Standing Scales

**Maintaining Compliance:** When existing scales of any type are replaced, acquire compliant standing scales until full scoping is met.

*NOTE:* If scales meet standards for both wheelchair scales and standing scales, they can count towards compliance for both types of scales

### Radiology/Imaging Equipment

**Maintaining Compliance:** When existing equipment is replaced, acquire compliant equipment until full scoping is met.

### Reference

1. Accessible Medical Equipment; Newly purchased, leased, or otherwise acquired medical diagnostic equipment; Fundamental alternation and undue burdens. 45 CFR §84.92(e) (2024). Accessed August 25, 2026. [https://www.ecfr.gov/current/title-45/part-84#p-84.92\(e\)](https://www.ecfr.gov/current/title-45/part-84#p-84.92(e))