

What Healthcare Facilities Need to Know About DOJ + HHS Requirements

DOES YOUR FACILITY NEED TO BE COMPLIANT?

To improve healthcare access for patients with disabilities, federal agencies are actively enforcing accessibility requirements for Medical Diagnostic Equipment (MDE). If your healthcare facility participates in Medicare, Medicaid or other federally funded programs, you'll likely be required to comply with Health and Human Services (HHS) and Department of Justice (DOJ) accessibility regulations incorporating standards developed by the U.S. Access Board. Examples of covered facilities include:

- Physician offices and medical practices
- Private hospitals and health systems
- Public hospitals
- Federal Qualified Health Centers (FQHCs)
- Rehabilitation facilities
- Mental health and behavioral health centers
- University and academic medical centers
- County or local health departments
- Specialty clinics and outpatient care centers

Consult your compliance, legal or regulatory affairs team to determine your obligations under the DOJ and HHS accessibility rules.

July 8, 2024

HHS enforcement began¹

October 8, 2024

DOJ enforcement began²

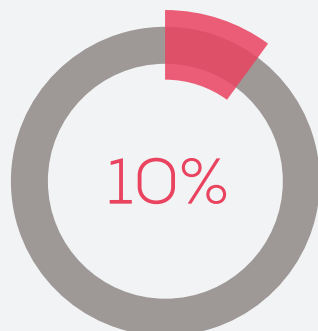
July 8, 2026

HHS 2026 compliance deadline¹

August 9, 2026

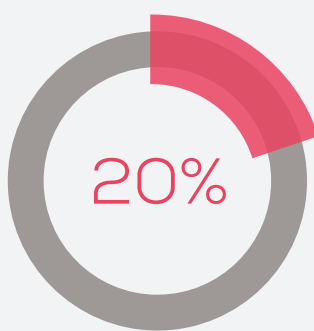
DOJ 2026 compliance deadline²

HOW MANY ACCESSIBLE DEVICES ARE REQUIRED?



GENERAL HEALTHCARE FACILITIES

10% of MDE or 1 compliant unit
(whichever is greater)



REHABILITATION FACILITIES

20% of MDE or 1 compliant unit
(whichever is greater)

In 2026, every facility must have at least:

1 exam or procedure chair and weight scale that meets the 2017 USAB Standards.

10-20% compliant MDE when purchasing new equipment.



Midmark 626 Barrier-Free®
Examination Chair
15.5" Low Seat Height



Ritter 228 Barrier-Free®
Examination Chair
17" Low Seat Height



Ritter 229 Barrier-Free®
Examination Chair
17" Low Seat Height



Midmark 631
Procedure Chair
17" Low Seat Height

US ACCESS BOARD STANDARDS FOR EXAMINATION + PROCEDURE CHAIRS



Midmark 626 Barrier-Free® Examination Chair

- 01 Seat Height:** 17" - 19" or lower and 25" or higher
The 2024 update, requiring a 17-inch low transfer height, is not yet enforced—but the HHS and DOJ have signaled intent to adopt it.
- 02 Transfer Surface:** 21" wide and 17" deep
- 03 Base Clearance:** 26" wide or less
- 04 Transfer Supports:** Less than 1½" from surface edge, capable of supporting transfer on each side and greater than 15½" long 6" – 18" high 1¼" – 2" grip diameter with continuous gripping surface
Patient Support Rails - 9A600001
Patient Support Rails+ - 9A600002
- 05 Leg Supports:** Supports the patient's thigh, knee and calf when stirrups are used
626/228/229 Exam Chairs - 9A645001
631-001 Procedure Chair - 9A411002

FUTURE-PROOF YOUR PRACTICE.

The DOJ and HHS are actively enforcing the 2017 USAB MDE standards. In 2024, the USAB issued new MDE design standards, including a low seat height of 17" or lower. The DOJ and HHS are likely to adopt USAB's 2024 standards in the future.

DON'T RISK NON-COMPLIANCE.

Here's how to prepare.

- Take an inventory of your current exam chairs and scales.
- Identify equipment that meets current accessibility standards.
- Determine whether your facility falls under the 10% or 20% requirements.
- Develop a replacement or acquisition plan to ensure compliance in the near future.

	15.5" Seat Height (Uncompressed)	17" Seat Height (Uncompressed)	Power Base	Power Back	Power Foot + Tilt	Integrated Digital Scale	Clean Assist Roller System	Active Sensing Technology	Hand + Foot Controls	650 lb Weight Capacity	500 lb Weight Capacity	Tamper-Resistant Electrical Receptacles	Debris Tray	Drawer Heater	Stirrups
Examination Chairs															
626-001	•		•	•			•	•	•	•		•	•	•	•
626-002	•		•	•			•	•	•	•		•	•	•	•
626-003	•		•	•		•	•	•	•	•		•	•	•	•
626-004	•		•	•		•	•	•	•	•		•	•	•	•
626-005	•		•	•		•	•	•	•	•		•	•	•	•
626-006	•		•	•		•	•	•	•	•		•	•	•	•
229-002		•	•	•				•			•	•	•	•	•
229-003		•	•	•			•	•			•	•	•	•	•
228-001		•	•								•				•
228-002		•	•					•			•	•	•	•	•
228-003		•	•				•	•			•	•	•	•	•
Procedure Chairs															
631-001		•	•	•	•			•	•	•		•	•	•	•

Talk to a Midmark representative about accessible care solutions.

Sources

- <https://www.federalregister.gov/documents/2024/05/09/2024-09237/nondiscrimination-on-the-basis-of-disability-in-programs-or-activities-receiving-federal-financial>
- <https://www.federalregister.gov/documents/2024/08/09/2024-16889/nondiscrimination-on-the-basis-of-disability-accessibility-of-medical-diagnostic-equipment-of-state>
- <https://www.federalregister.gov/documents/2024/07/25/2024-16266/standards-for-accessible-medical-diagnostic-equipment>
- https://www.ncd.gov/assets/uploads/reports/ncd_medical_equipment_report_508.pdf