



Access to Medical Care & Medical Diagnostic Equipment Best practices

**The ADA National Network's
Healthcare webinar series
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Presenter



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Agenda

- Overview of ADA requirements for access to medical care services and facilities.
- Best practices for accessible examination rooms.
- Medical diagnostic equipment overview and technical requirements.
- Questions





Overview of ADA requirements

*for access to medical care services
and facilities*

Technical Assistance Publication



U.S. Department of Justice
Civil Rights Division
Disability Rights Section

U.S. Department of Health and Human Services
Office for Civil Rights

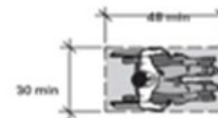


Americans with Disabilities Act

Access To Medical Care For Individuals With Mobility Disabilities



onto it. The minimum amount of space required is 30 inches by 48 inches. Clear floor space is needed along at least one side of an adjustable height examination table.



Plan view showing an outline of a clear floor space of 30 inches by 48 inches

Because some individuals can only transfer from the right or left side, providing clear floor space on both sides of the table allows one accessible table to serve both right and left side transfers. Another way to allow transfers to either side of exam tables, particularly when more than one accessible examination room is available, is to provide a reverse furniture layout in another accessible examination room.



Patient sitting on adjustable height exam table positioned with clear floor space on both sides

PART 3: ACCESSIBLE EXAMINATION ROOMS

The room should also have enough turning space for an individual using a wheelchair to make a 180-degree turn, using a clear space of 60 inches in diameter or a 60 inch by 60 inch T-shaped space. Movable chairs and other objects, such as waste baskets, should be moved aside if necessary to provide sufficient clear floor space for maneuvering and turning.

When a portable patient lift or stretcher is to be used, additional clear floor space will be needed to maneuver the lift or stretcher. Ceiling-mounted lifts, on the other hand, do not require the additional maneuvering clear floor space because these lifts are mounted overhead. (See Part 4 of this publication for more information about lifts.)



Plan view of part of an examination room showing clear floor space for turning a wheelchair. This space can also make it possible for use of a portable patient lift.

Services and Facilities

The ADA requires access to medical care services and the facilities where the services are provided.

- Private hospitals or medical offices are covered by Title III of the ADA as places of public accommodation.
- Public hospitals and clinics and medical offices operated by state and local governments are covered by Title II of the ADA as programs of the public entities.
- Section 504 covers any of these that receive federal financial assistance, which can include Medicare and Medicaid reimbursements.

General Requirements

- Accessibility is not only legally ***required***, but also important medically so that minor problems can be detected and treated before turning into major and possibly life-threatening problems.
- All buildings, including those built before the ADA went into effect, are subject to accessibility requirements for existing facilities.

Titles II and III of the ADA and Section 504 require that medical care providers provide individuals with disabilities:

- Full and equal access to their health care services and facilities; and
- Reasonable modifications to policies and procedures when necessary to make health care services fully available to individuals with disabilities, unless the modifications would fundamentally alter the nature of the services (i.e., alter the essential nature of the services).

Commonly Asked Questions

Question:

Is it okay to examine a patient who uses a wheelchair in the wheelchair, because the patient cannot get onto the exam table independently?

Answer:

Generally, no. Examining a patient in their wheelchair usually is less thorough than on the exam table and does not provide the patient equal medical services.

Frequently Asked Questions

Question:

Is it okay to tell a patient who has a disability to bring along someone who can help at the exam?

Answer:

No. If a patient chooses to bring along a friend or family member to the appointment, they may.

However, a patient with a disability, just like other individuals, may come to an appointment alone, and the provider ***must*** provide reasonable assistance to enable the individual to receive the medical care.



Best practices

for accessible examination rooms

Accessible Examination Rooms

An accessible examination room has features that make it possible for patients with disabilities, including those who use wheelchairs, to receive appropriate medical care.

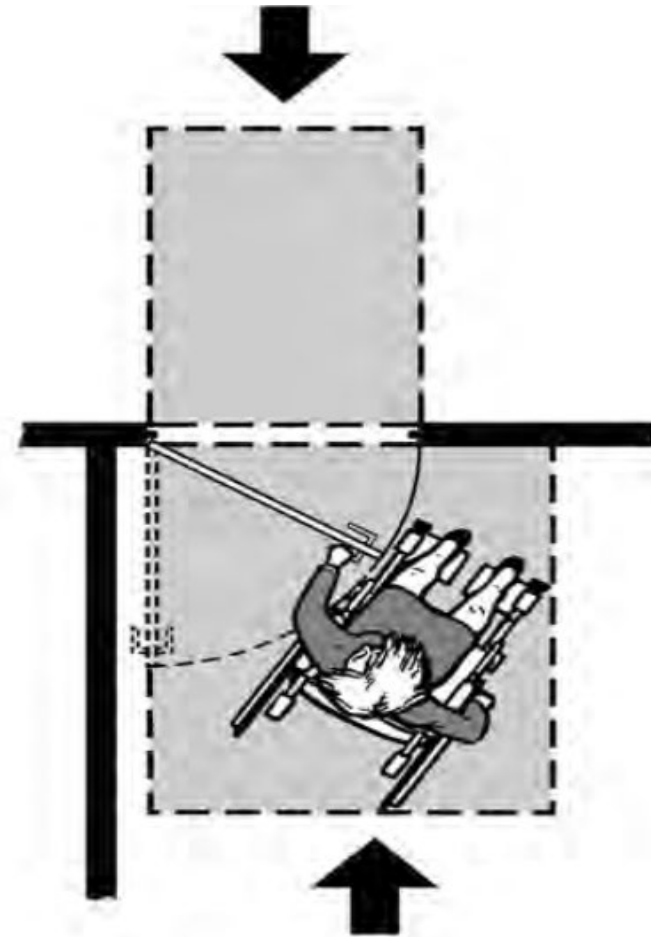
- An accessible route to and through the room.
- An entry door with adequate clear width, maneuvering clearance, and accessible hardware.
- Appropriate models and placement of accessible examination equipment.
- Adequate clear floor space inside the room for side transfers.

Entry Doors

Under the ADA Standards for accessible design, an accessible doorway must have a minimum clear opening width of **32 inches** when the door is opened to 90 degrees.

Maneuvering clearances on both sides of the door must also comply with the ADA standards

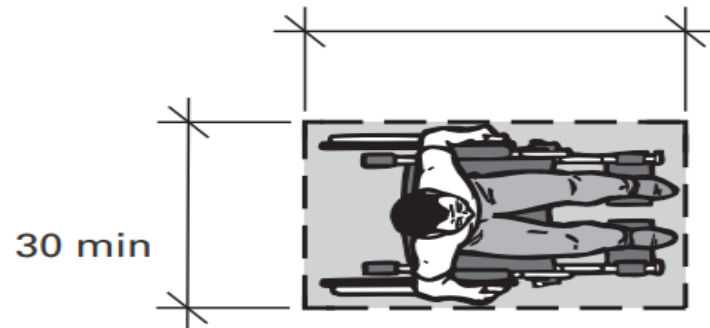
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Plan view showing clear floor space on both sides of entry door to permit entry and exit

Clear Floor and Turning Space Inside Examinations Rooms

- An individual must be able to approach the exam table and any other elements of the room to which patients have access.
- The exam table must have sufficient clear floor space next to it so that an individual using a wheelchair can approach the side of the table for transfer.
- The minimum amount of space required is 30 inches by 48 inches. Along at least one side of an adjustable height examination table.

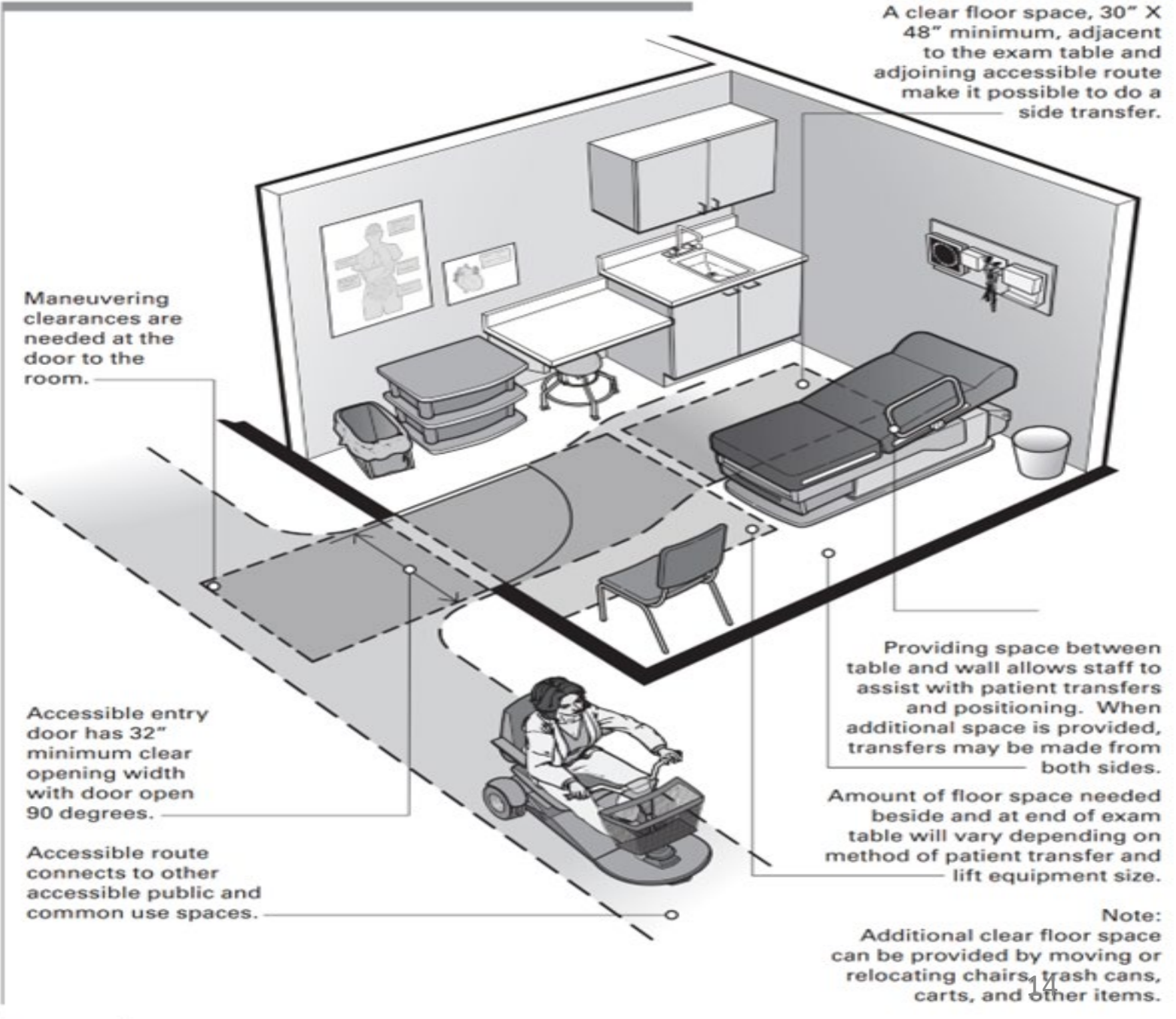


Plan view showing an outline of a clear floor space of 30 inches by 48 inches



Patient sitting on adjustable height exam table positioned with clear floor space on both sides

Features of an Accessible Examination Room



Access to Medical Care for Individuals with Mobility Disabilities



Medical Diagnostic Equipment

*Overview and Technical
Requirements*

Rehabilitation Act §510

Mandates the Access Board to issue minimum technical criteria for accessible medical diagnostic equipment in consultation with the FDA

Affordable Care Act amends the Rehabilitation Act to address access to MDE

(March 23, 2010)



Rehabilitation Act §510

Specifically addresses equipment in:

- Physicians' offices, clinics, emergency rooms, hospitals, other medical settings. Includes optometrists and dentists
- Scoping to be determined in appropriate regulatory or administrative context
- Final Standards are voluntary until adopted by an enforcing Agency e.g., DOJ for the Americans with Disabilities Act
- Can be voluntarily adopted through policy

MDE Standards

- Do not address the accessibility of existing diagnostic equipment
- Do not require a percentage of new or replacement equipment to be accessible



Application

Purpose:

To ensure accessibility to, and usability of the diagnostic equipment by patients with disabilities.

- *Provide for independent access and use of diagnostic equipment to the maximum extent possible*
- *Applies to new diagnostic equipment, based on the patient positions that the equipment supports, during patient transfer and diagnostic use*
- *Communication features or operable parts – where provided for patient use*

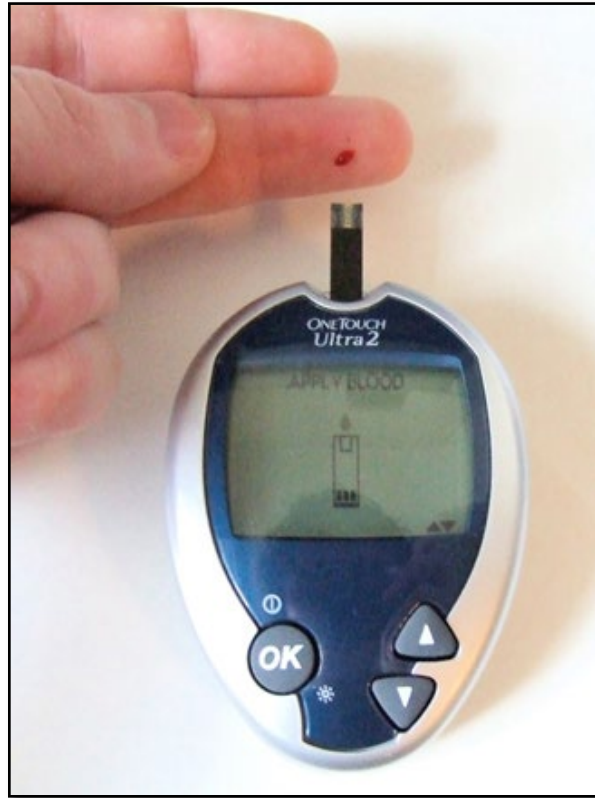
Diagnostic Equipment Includes:

- Examination tables
- Examination chairs (including those used for dental or optical exams)
- Weight scales
- Radiological equipment
 - X-ray machines
 - MRI, CT Scan
 - Mammography equipment
- Other MDE

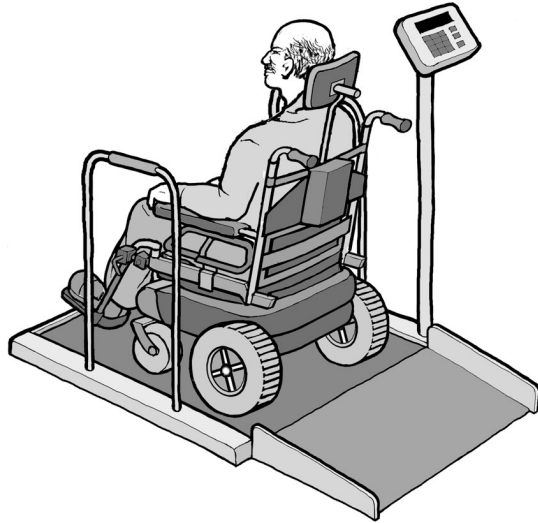


Standards do not cover:

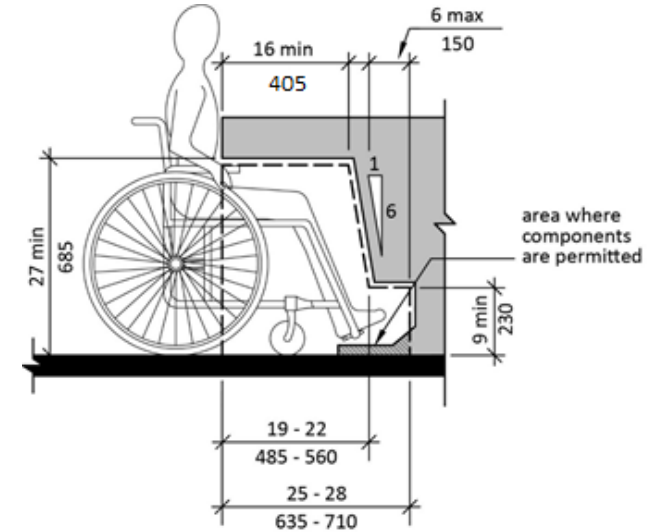
- Personal devices
 - Blood glucose monitors
- Positioning aids
 - Wedges
- Surgical and medical instruments
 - Stethoscopes
 - Forceps, scalpels



Measurements and Dimensions



- Based on Adult Dimensions and Anthropometrics
- Use of MDE by children is not addressed in these standards



- Dimensions not stated as maximum, or minimum are absolute
- Subject to conventional industry tolerances
- Measured in US or metric units, independently

M201 General



- Scoping to be determined by enforcing authority
 - Potential enforcing authorities could include DOJ, HHS, or adoption through policy (like select VAs)
- General exception:
 - “rare circumstances where compliance would alter diagnostically required structural or operational characteristics of the equipment and would prevent the use of the equipment for its intended diagnostic purpose”.
 - Diagnostic equipment shall comply to the maximum extent practicable.

Chapter 3

Supine, prone, or side-lying positions (M301)

Seated position (M302)

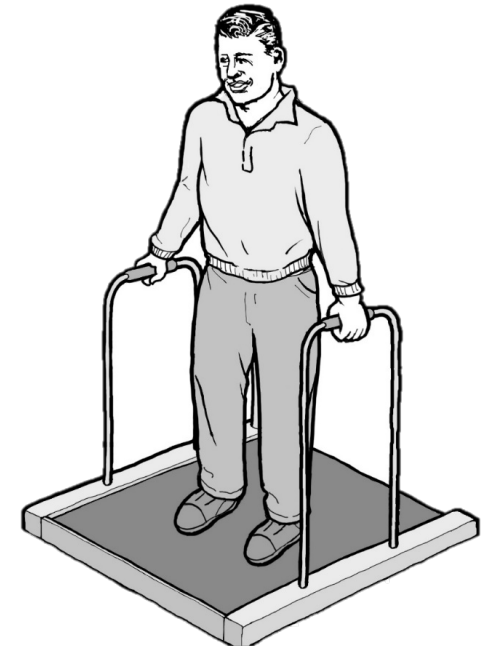
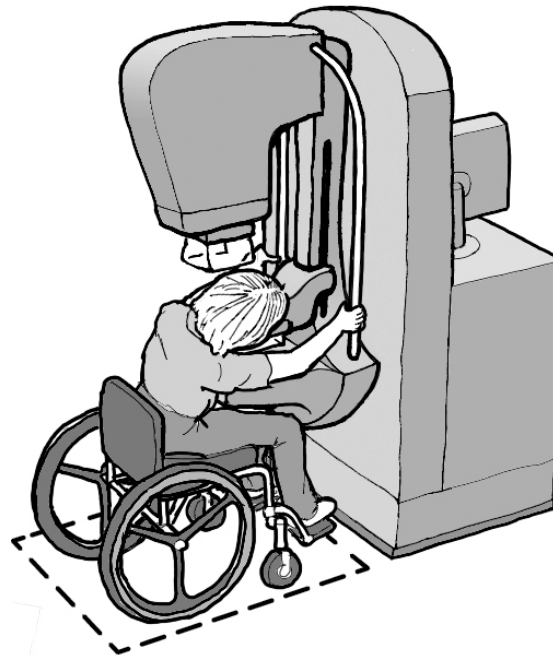
Seated in a wheelchair (M303)

Standing position (M304)

Supports (M305)

Communication (M306)

Operable parts (M307)

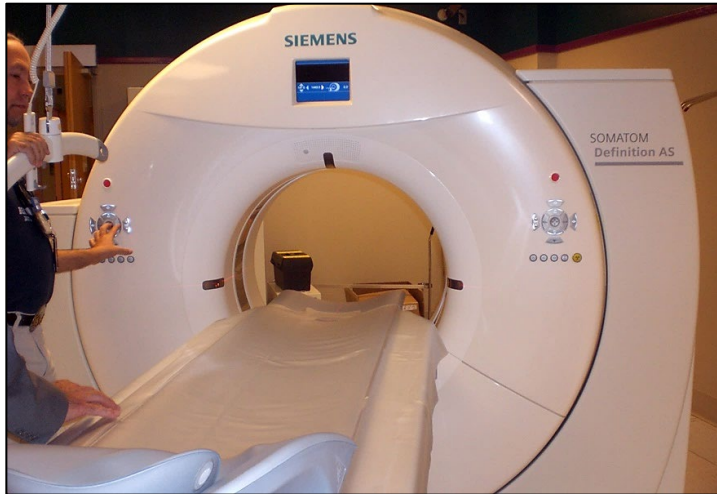




Medical Diagnostic Equipment Chapter 3

Supine, prone, or side-lying positions (M301)

Supine, Prone, or Side-Lying Position (M301)



Includes:

- MRI, CT scan
- Examination tables
- Hospital stretcher

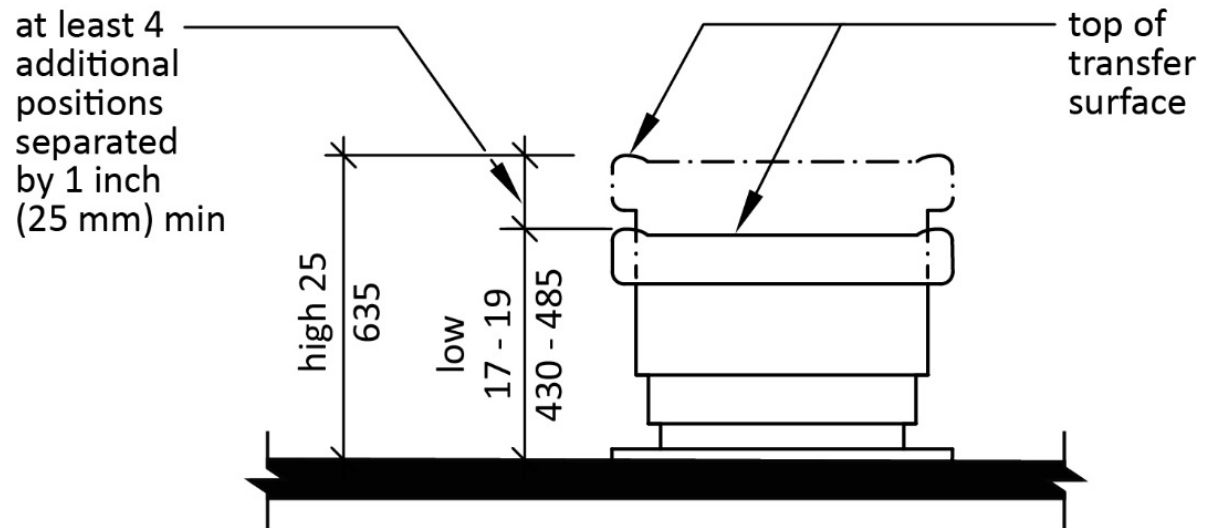
Does not include:

- Examination chairs that recline (covered in M302)

Transfer surface

Height adjustable

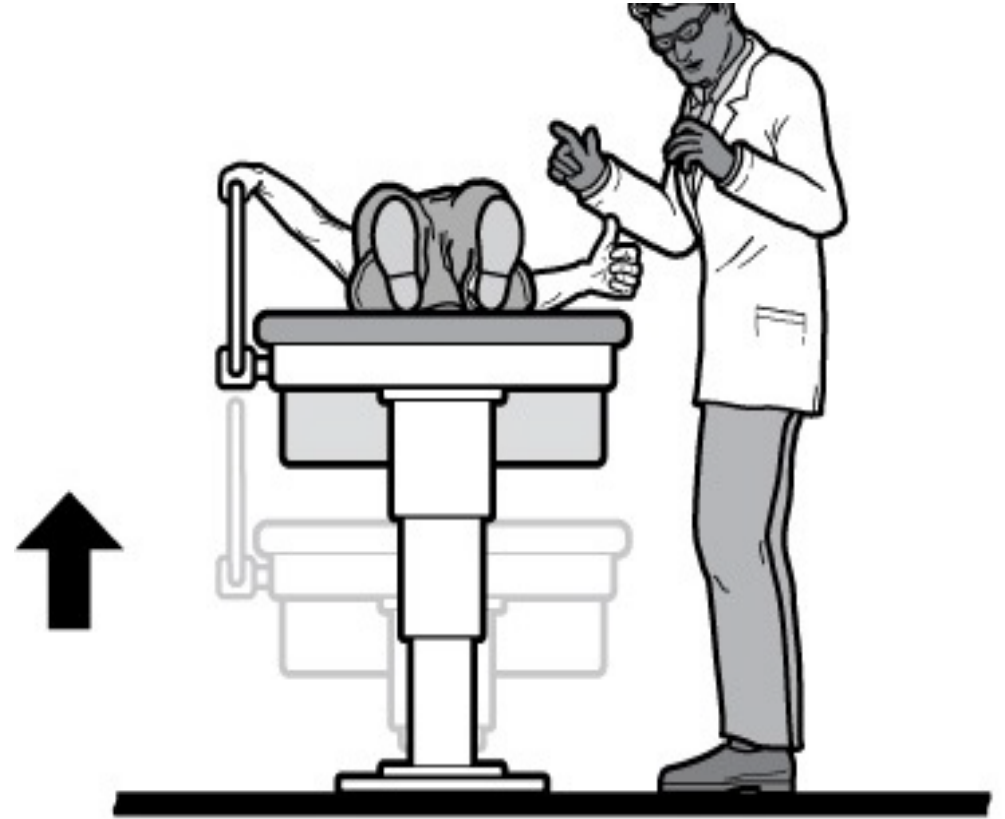
- Measured from floor to top of uncompressed transfer surface
- High transfer position at 25 inches minimum
- Low transfer position of (17-19 inches) maximum
- At least 4 additional transfer positions located between the low and high, separated by 1 inch minimum



Transfer surface Low position

Low position sunset clause

- Low transfer position height (17" – 19") expired (January 9, 2022)
- On May 23, 2023, the Board published an NPRM proposing a low transfer height of 17 inches for examination tables and chairs.
- Board submitted the final rule to the Office of Information and Regulatory Affairs (OIRA).



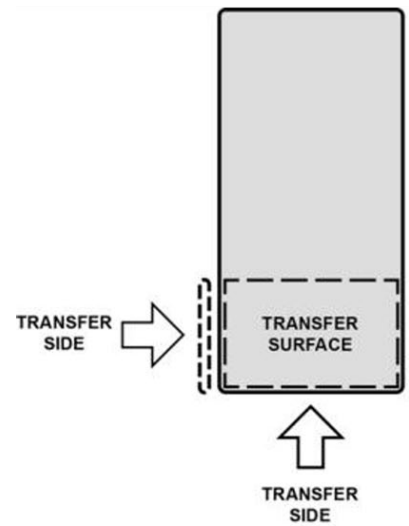
Transfer surface

End Transfer Surface

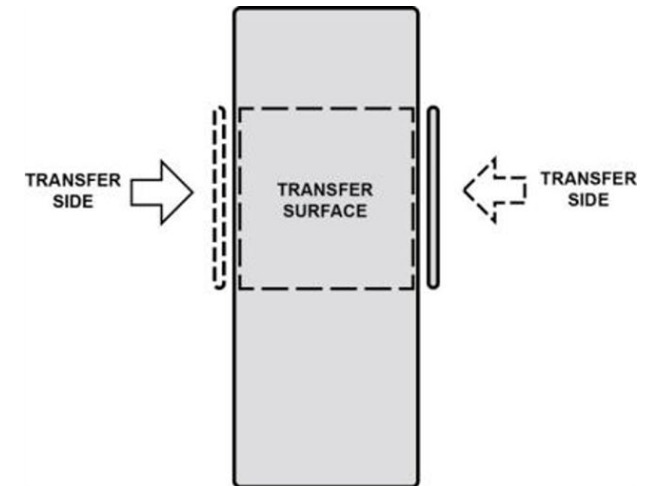
- Located at one end of an examination surface that allows transfer at the end and one adjoining side

Side Transfer Surface

- Located within the length of the examination surface that allows transfer on two opposing sides



End Transfer Surface

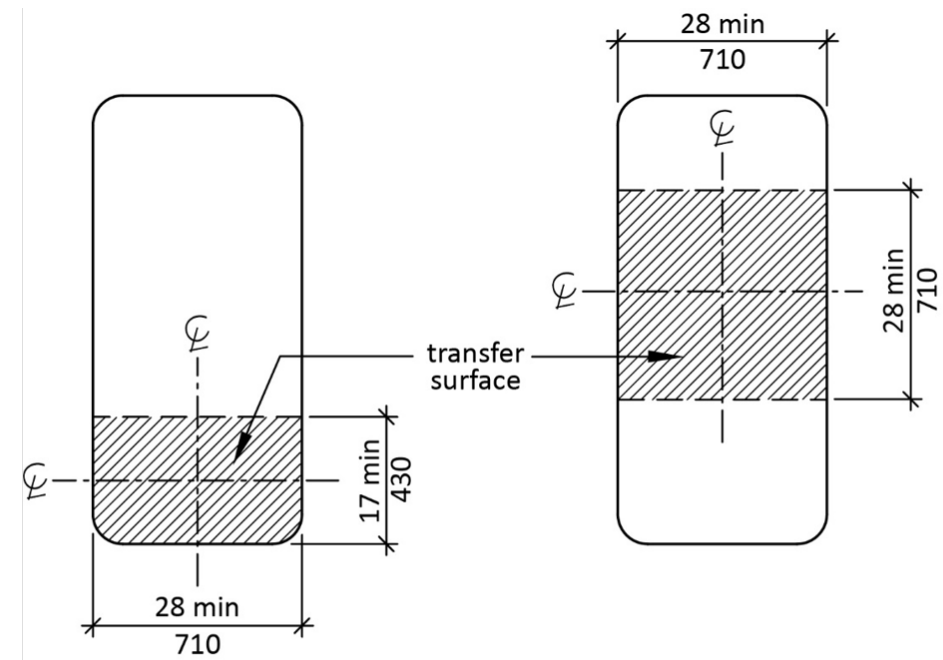


Side Transfer Surface

Transfer surface (Size)

Size

- Comply with either:
 - End Transfer
 - 17" x 28" min
 - Side Transfer
 - 28" x 28" min
- Measured from center points of their opposing sides



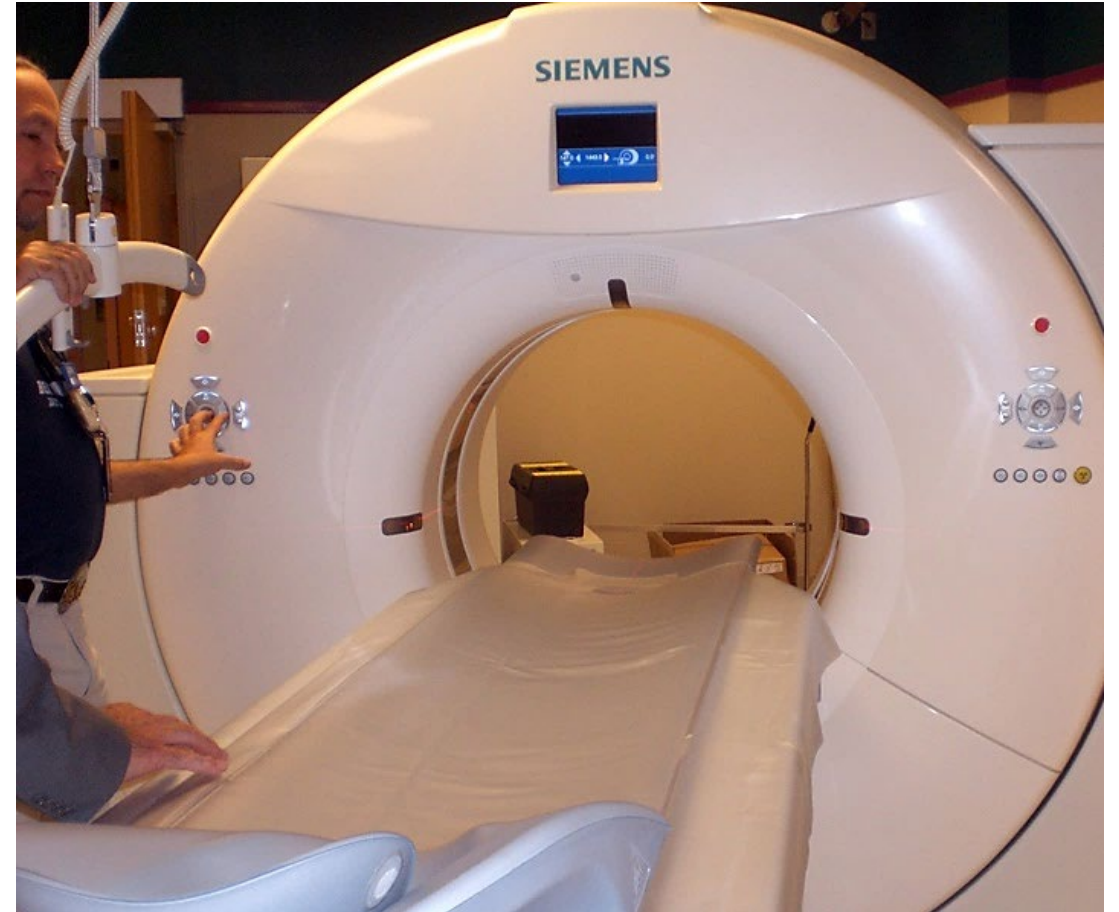
End Transfer

Side Transfer

Transfer surface (Exception)

Size: Exception

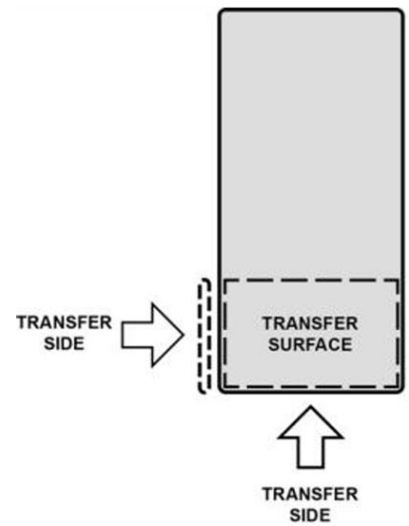
- Imaging equipment with bores
 - Width: 21" min
 - Not less than the full width of the examination surface provided



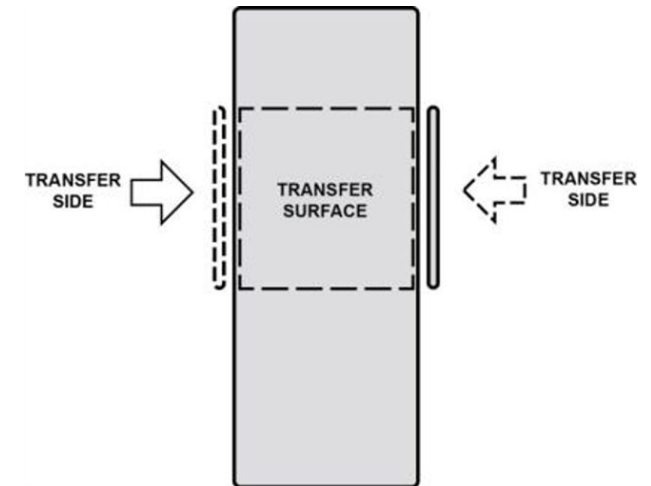
Transfer surface (Unobstructed)

Unobstructed transfer

- Each transfer surface shall provide two unobstructed sides for patient transfer
 - Side transfer = L side + R side
 - End transfer = end + (L/R) side



End Transfer Surface

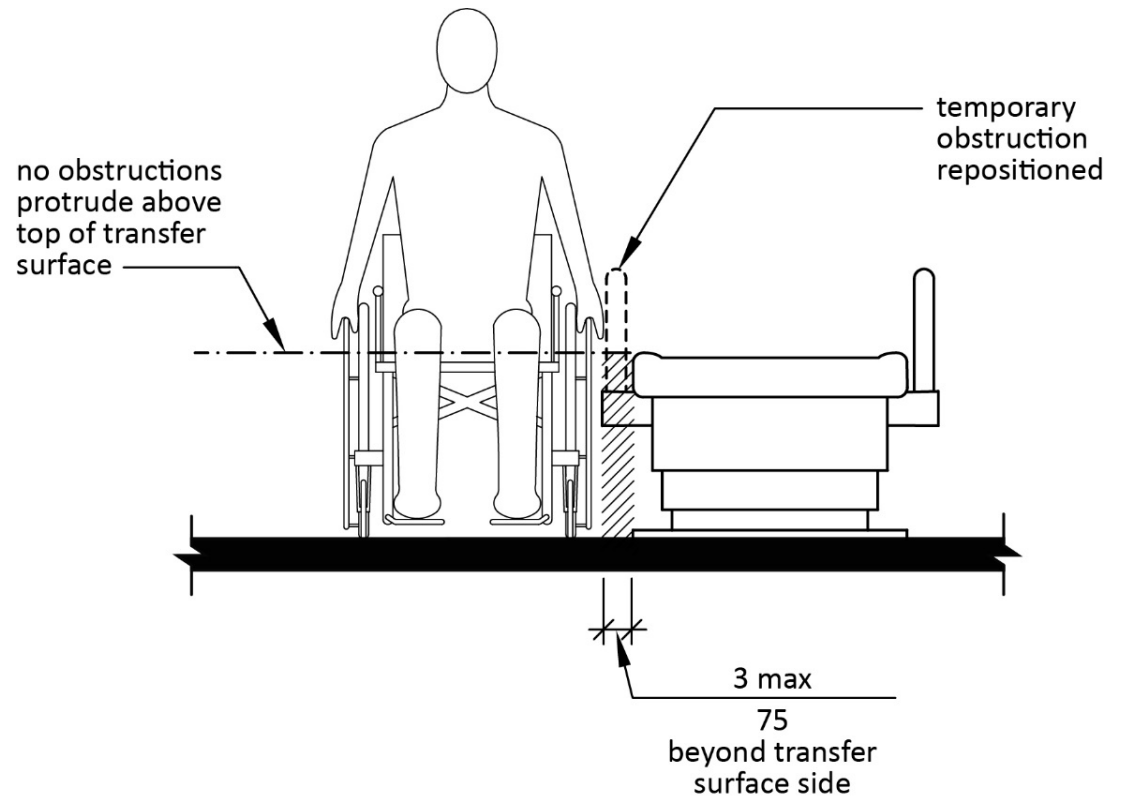


Side Transfer Surface

Transfer surface (Permitted Obstructions)

Permitted obstructions

- Obstructions less than 3" deep
 - Extend beyond transfer sides of transfer surfaces
 - Do not protrude above the tops of transfer surfaces
- Temporary obstructions provided they can be repositioned during transfer



Transfer supports

Location

End Transfer:

Short side of transfer surface,
opposite transfer side

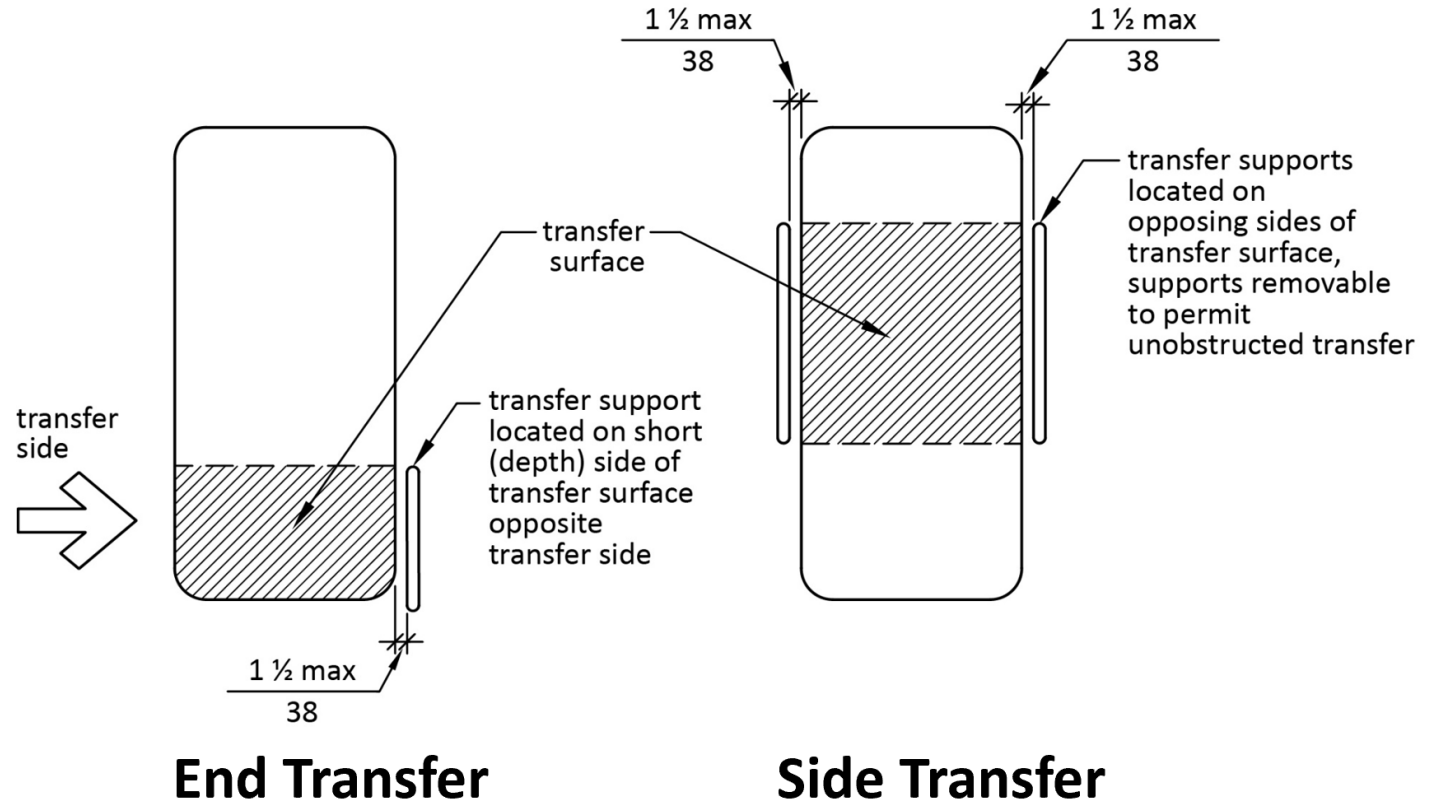
Side Transfer:

Opposite sides of transfer
surface, removable supports

Gap

1 ½" maximum gap

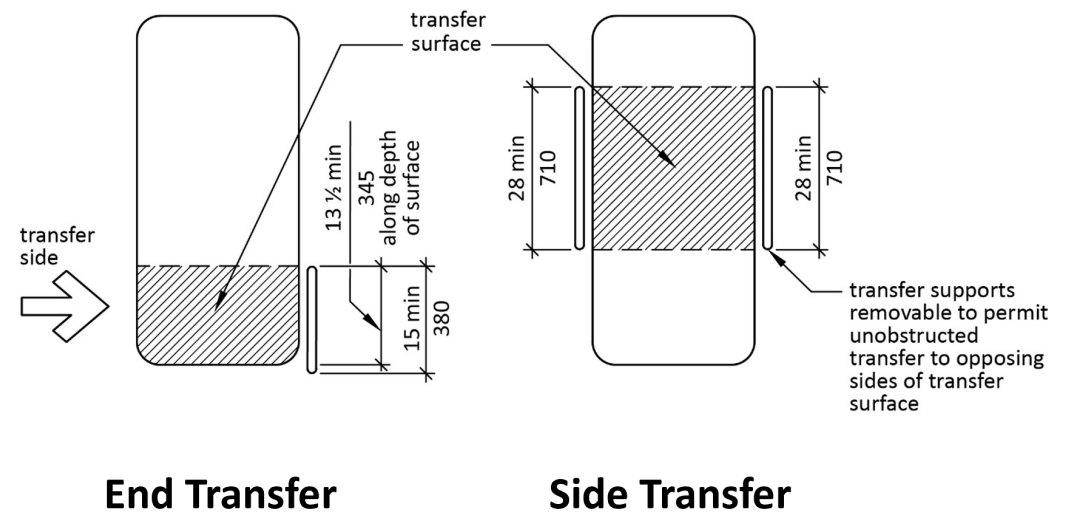
Measured horizontally from
nearest edge



Transfer supports (Length)

Length

- End Transfer:
 - Short side of transfer surface, opposite transfer side
 - 15" minimum
 - At least 13 ½" along depth of the transfer surface
- Side Transfer:
 - Opposite sides of transfer surface, removable supports
 - 28" minimum



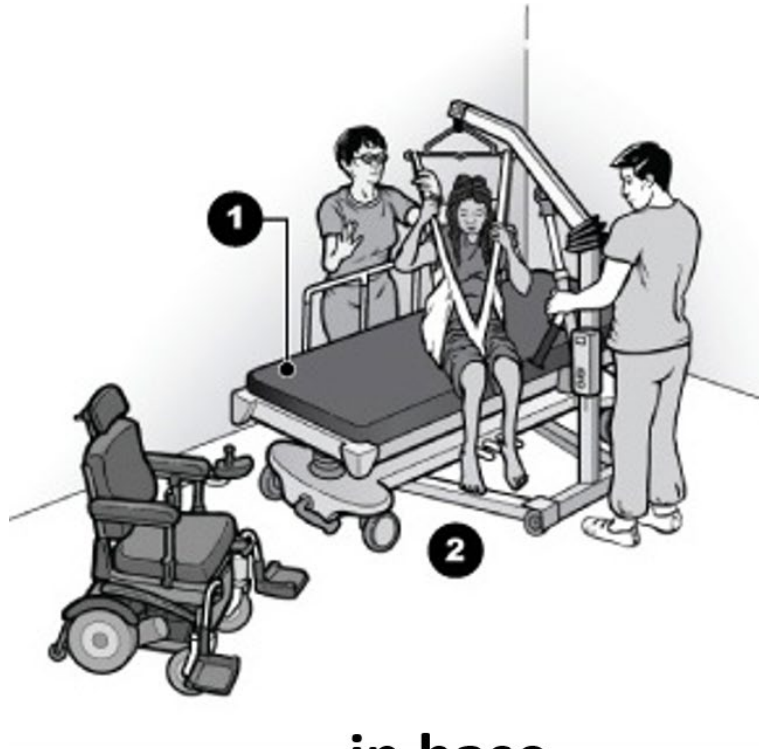
Transfer supports (Exceptions)

Exception: Wide Imaging Exam Surfaces

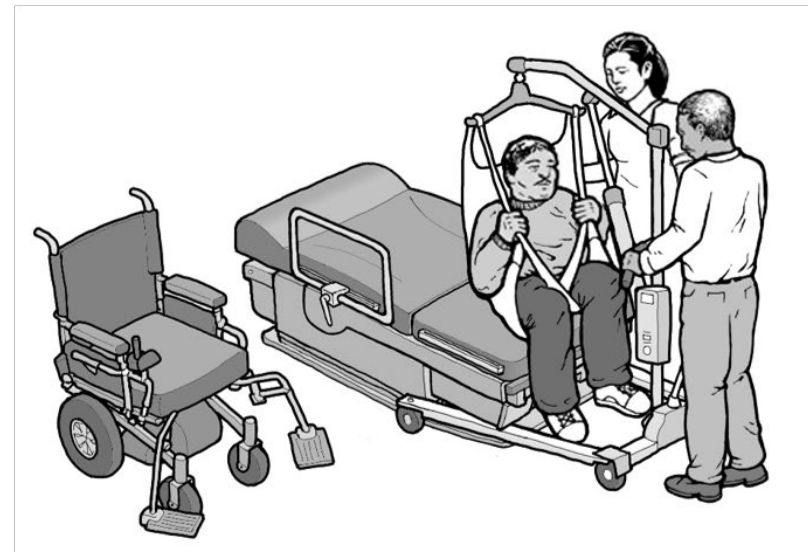
- Where width of imaging bed is greater than 24"
 - Transfer supports can be 12" long min.
 - During use, tops of gripping surfaces can be 3" min. and 6" max. higher than the top of the transfer surface.



Portable Lift Compatibility



**in base
clearances**



**around
base
clearances**

Lift compatibility

Clearance in Base

6 inches high minimum

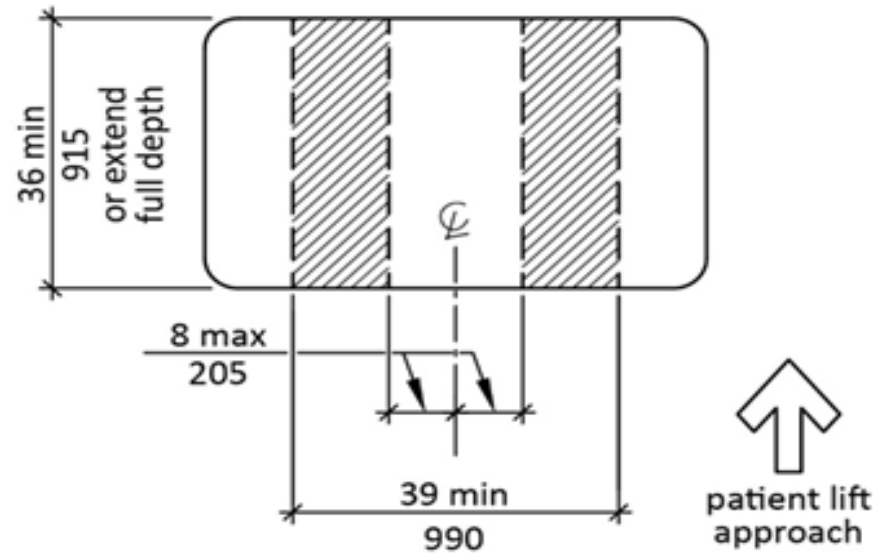
36 inches deep minimum

Measured from edge of examination surface

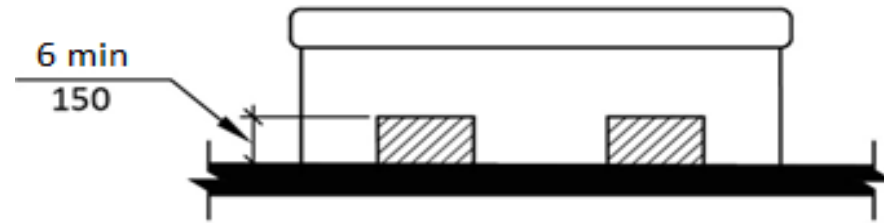
Or extend full depth if less than 36 inches deep

39 inches wide minimum

Equipment permitted within 8 inches maximum of the centerline



(a) plan



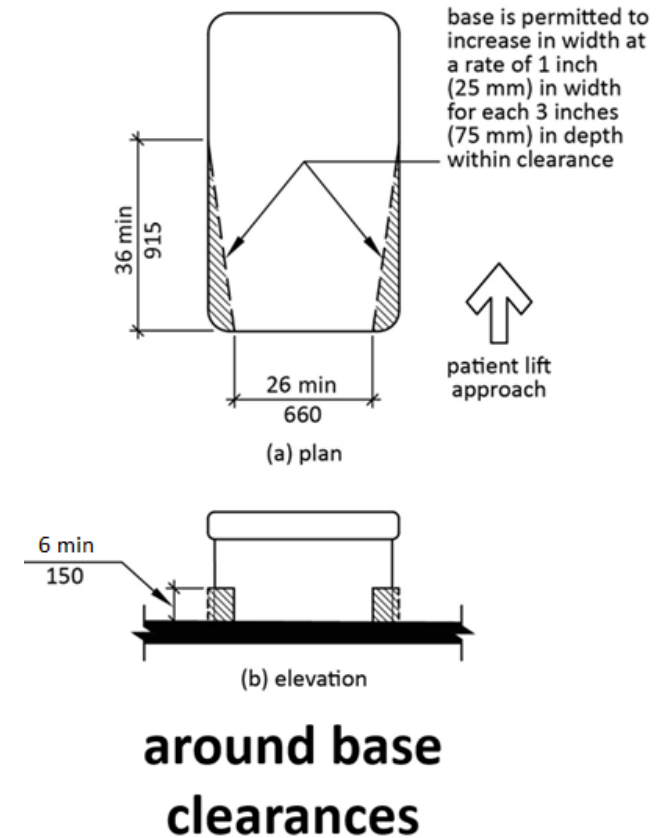
(b) elevation

**in base
clearances**

Lift compatibility (Clearance around base)

Clearance around Base

- 6 inches high minimum
- 36 inches deep minimum
 - Measured from edge of examination surface
- 26 inches wide minimum
 - Permitted to increase at a rate of 1 inch in width for each 3 inches in depth



Lift compatibility (Overhead lifts)

Exception: Overhead lifts

- Where fixed overhead patient lifts are provided and:
 - Use is permitted by enforcing authority
 - Equipment clearly labeled as not compatible with portable floor lifts





Chapter 3 MDE

Seated position (M302)

Transfer surface (Height adjustable)

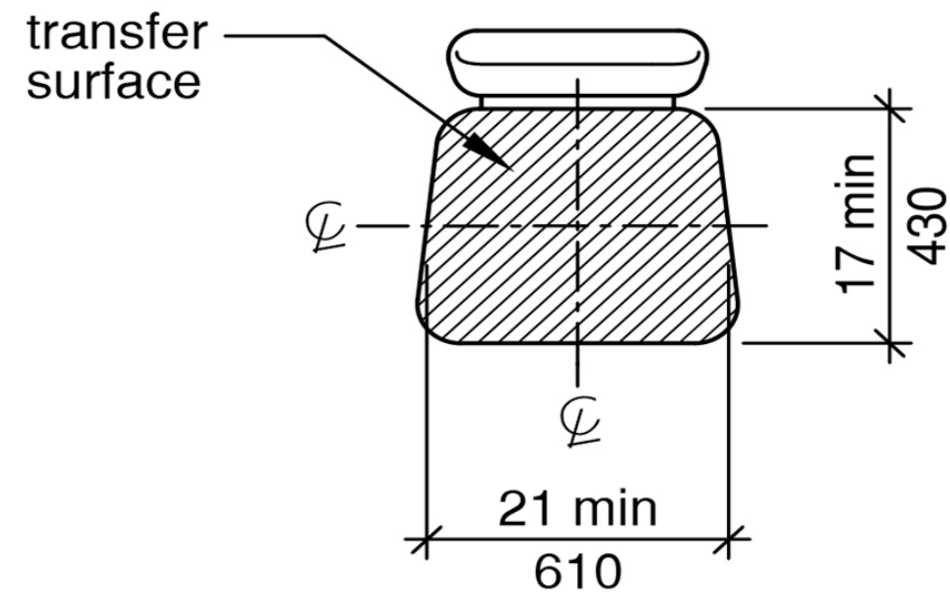
Height adjustable (same)

- Measured from floor to top of uncompressed transfer surface
- High transfer position at 25 inches minimum
- Low transfer position of (17-19 inches) maximum
- At least 4 additional transfer positions located between the low and high, separated by 1 inch minimum



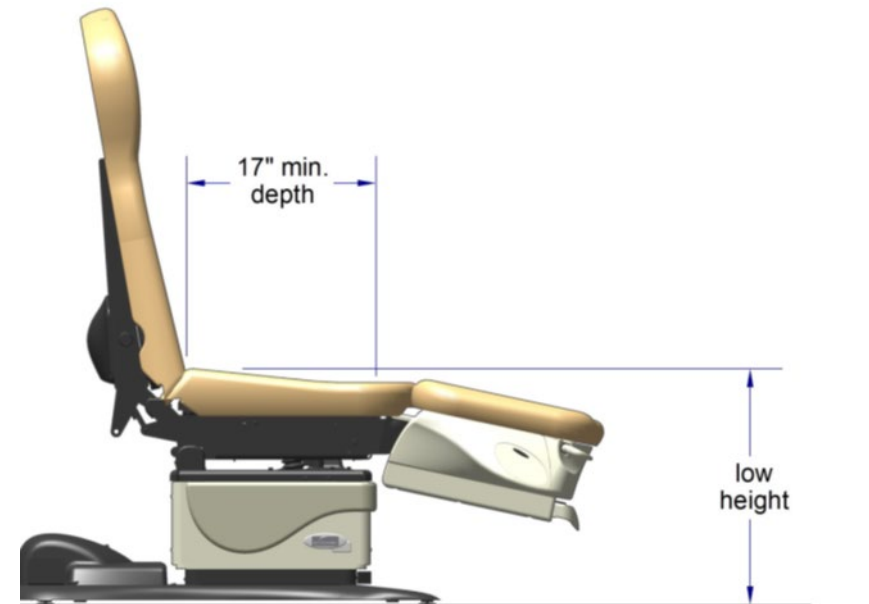
Transfer Surface (Minimum size)

- Minimum size



M302.2.2 Size

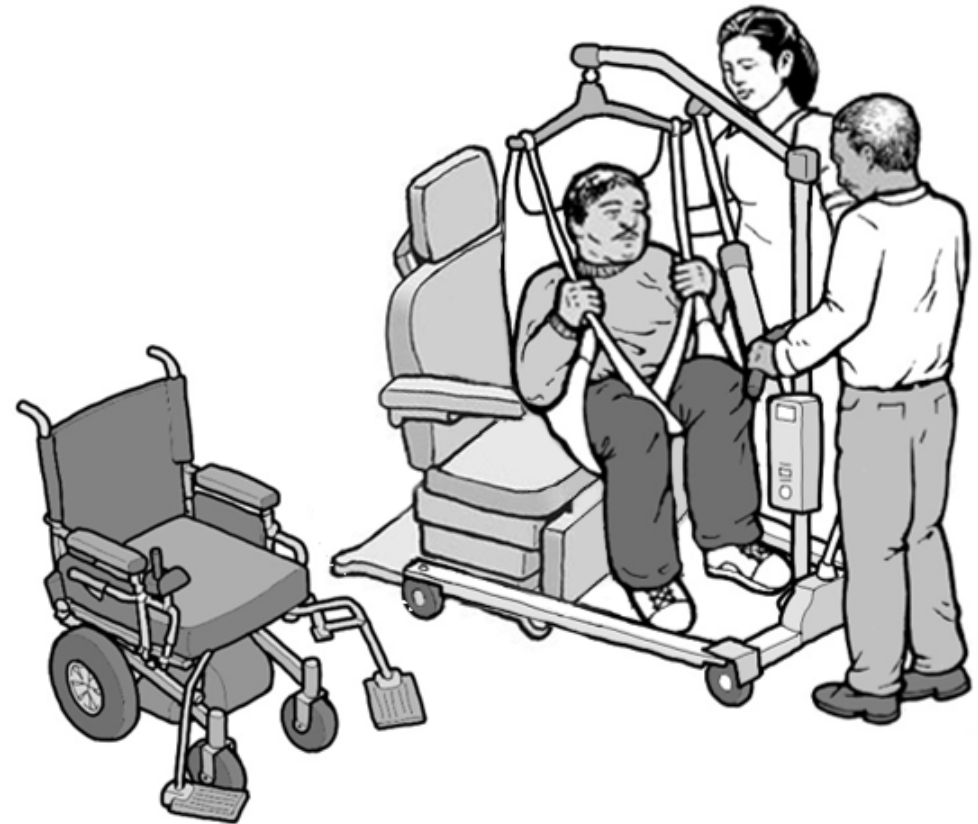
- How to measure



Lift compatibility (Same as M301)

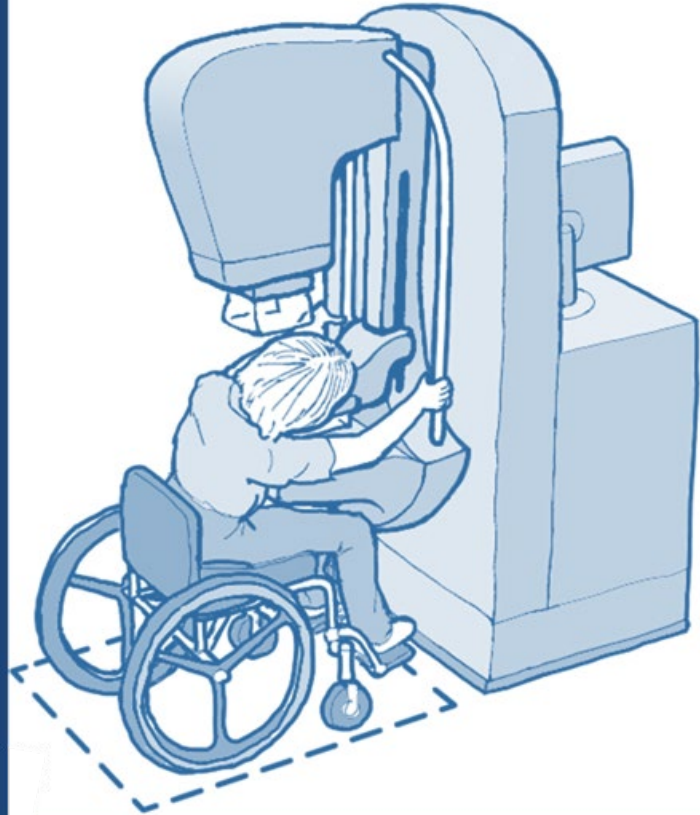
(same as M301)

- Clearance under base
- Clearance around the base
- Overhead lift exception



Chapter 3 Medical Diagnostic Equipment

Seated in a wheelchair (M303)



Wheelchair spaces

Orientation:

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 MDE is in use.



Wheelchair spaces

Width

Width :

36" wide minimum

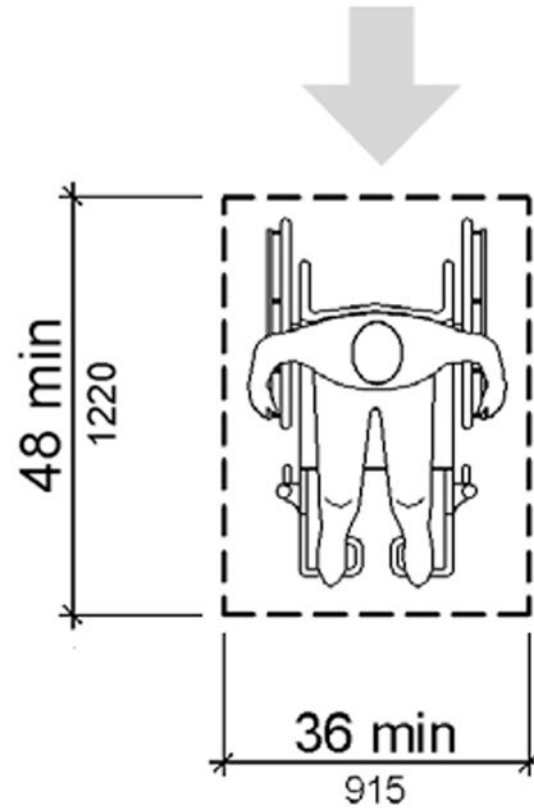
Depth:

Front or rear entry: 36" min

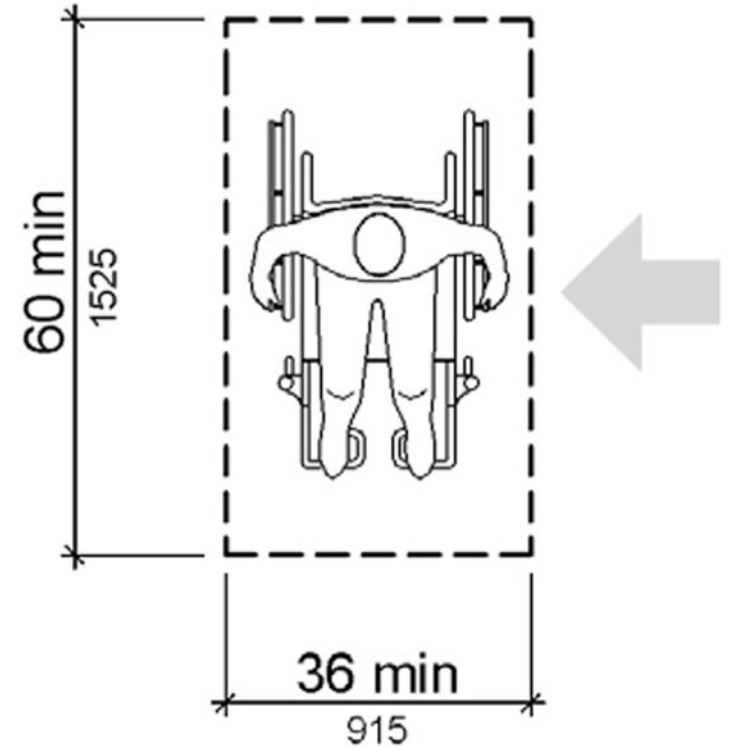
Side entry: 60" min

Pass-through: 40" min

(weight scales)



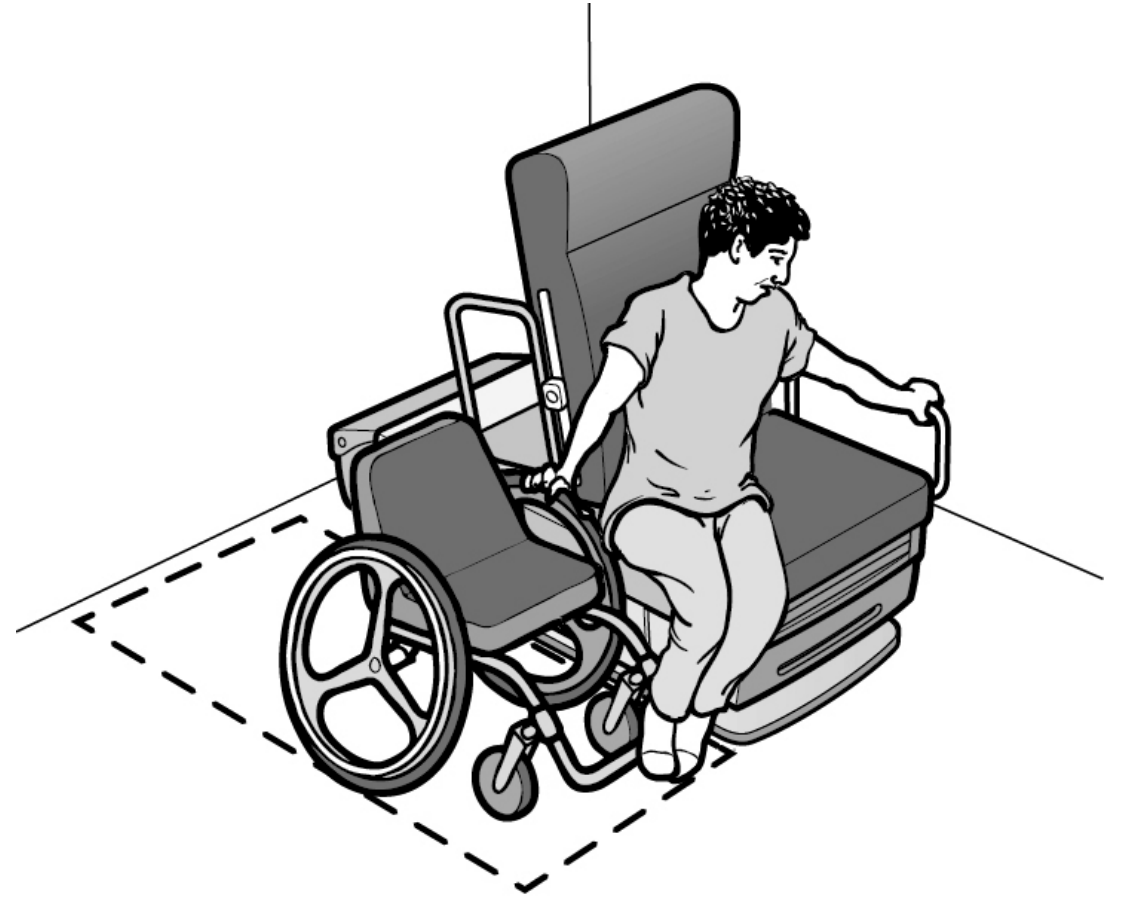
front or rear



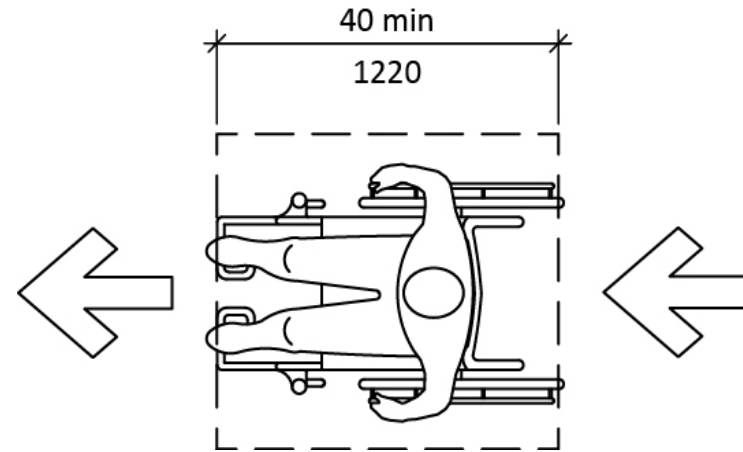
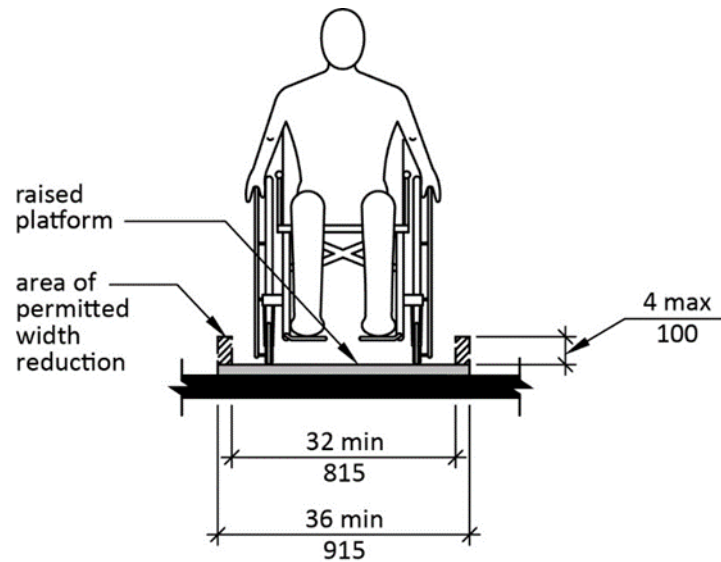
side

Wheelchair spaces (Clear floor space)

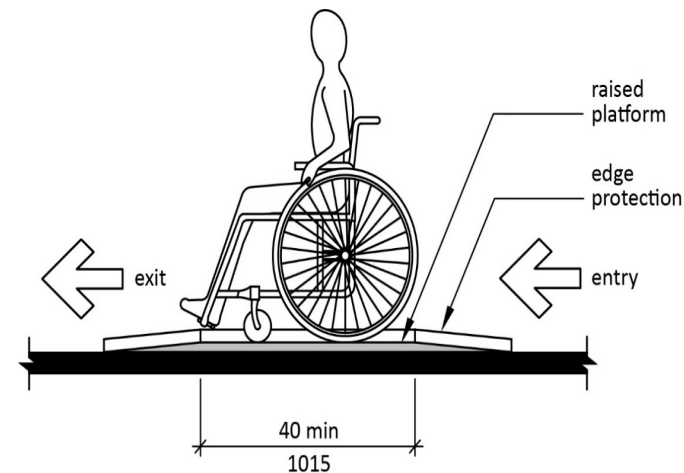
- The MDE Standard does NOT address clear floor space for transfers



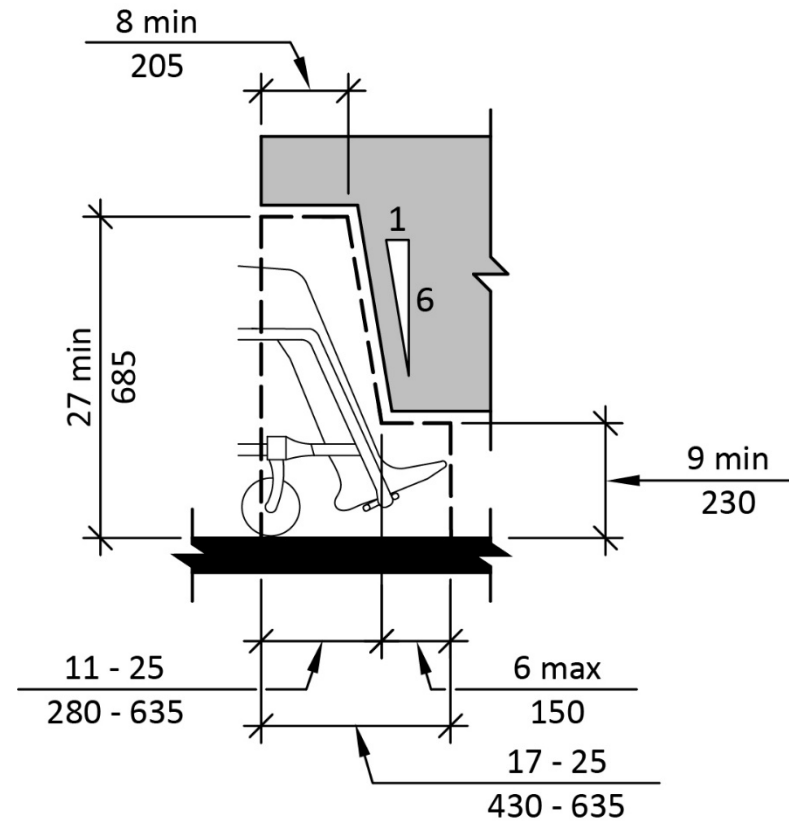
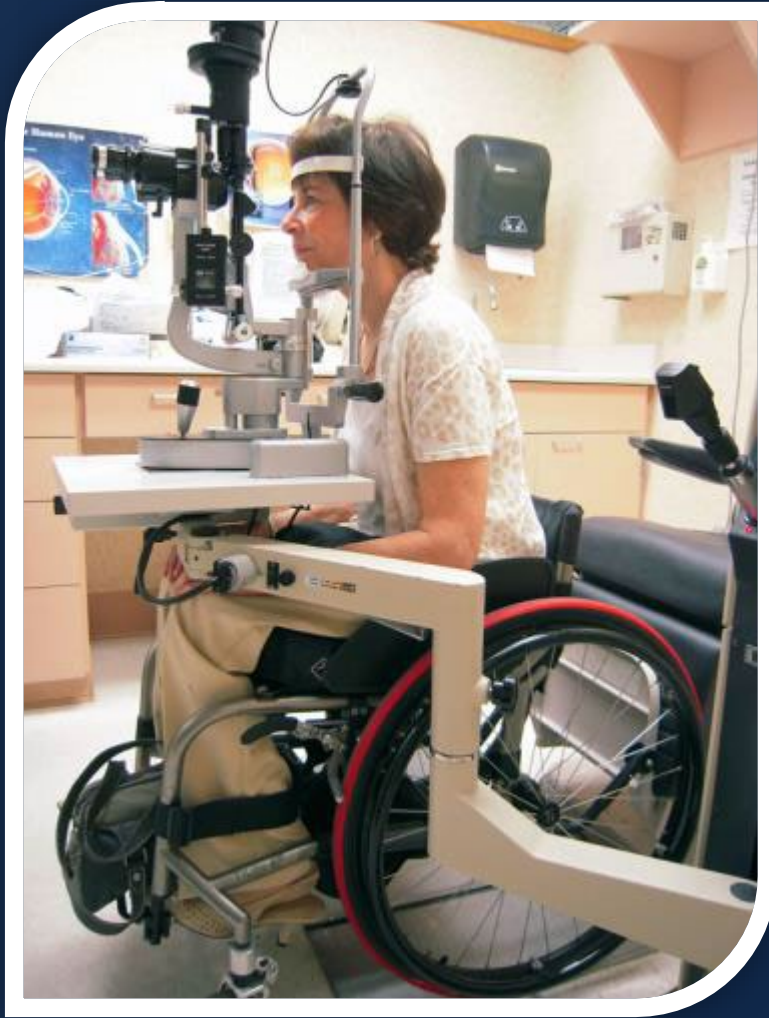
Wheelchair Spaces on Weight Scales - M303



**Pass through entry
depth and width
exception address**



Clearances beneath Components (M303)

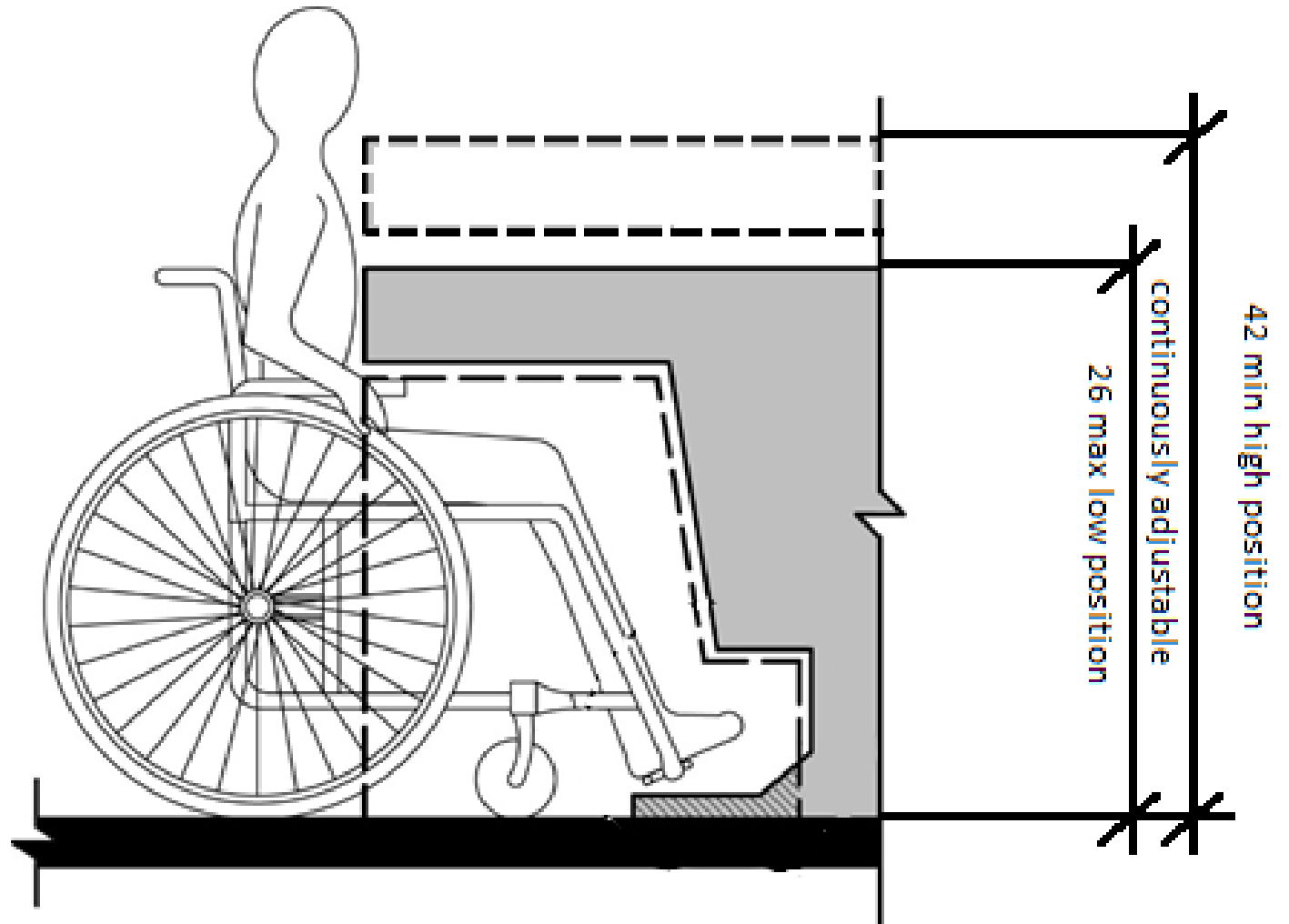


Most MDE knee and toe clearance will be the same as ADA

Breast platforms

Height adjustable platform
(M303.4.1)

continuously adjustable
low height of 26 inches
high height of 42 inches

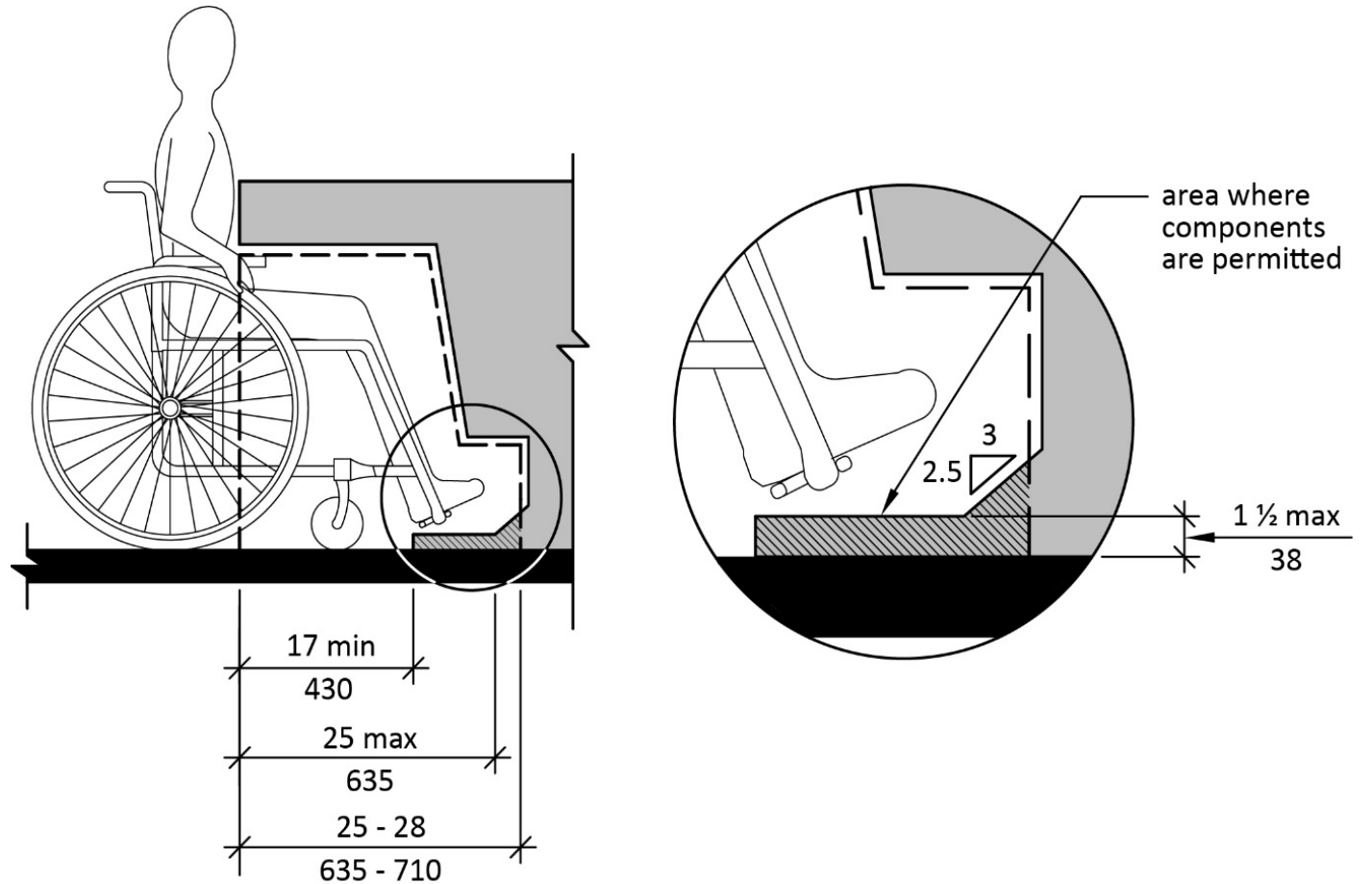


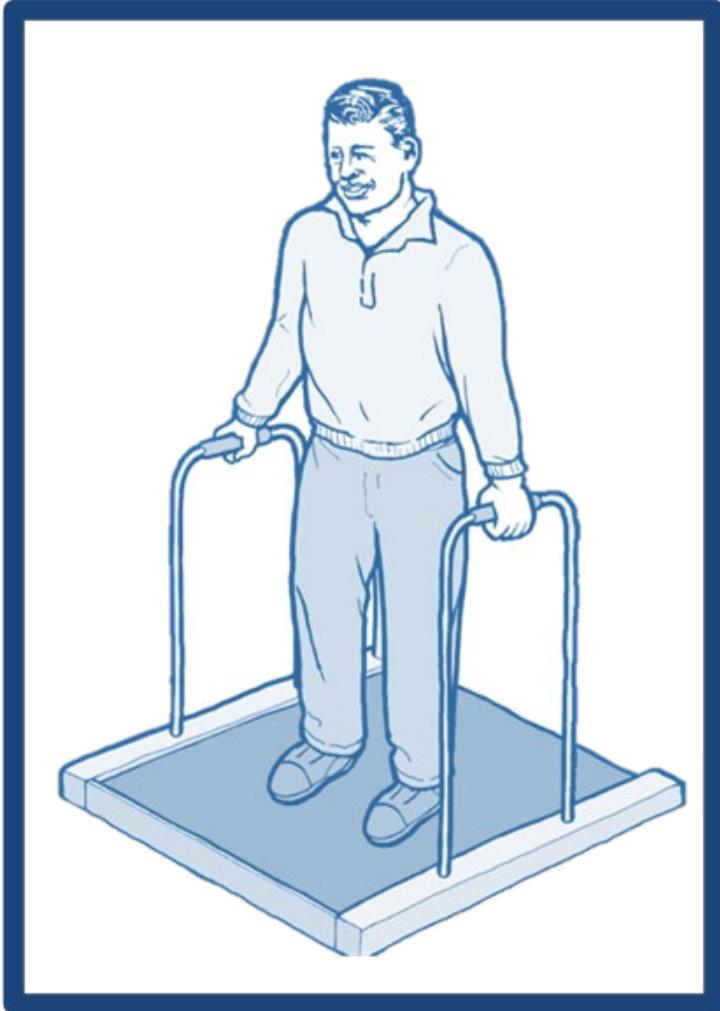
Breast platforms Clearances

Clearances beneath
Components (M303)

Knee clearance 17" deep min
to allow user to bring chest in
contact with platform

Knee and toe clearance allows
additional obstruction under
foot plates





MDE Chapter 3

Standing position (M304)

Standing Position (M304)

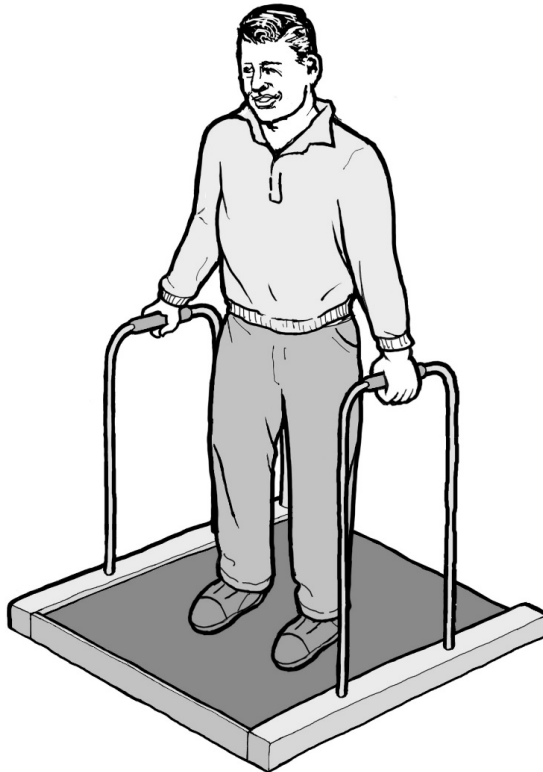
- Slip resistant standing surface
- Supports provided on two sides
- Exception: Equipment with pass-through entry/exit can provide one horizontal support



Standing Supports – M305.3

Horizontal Supports:

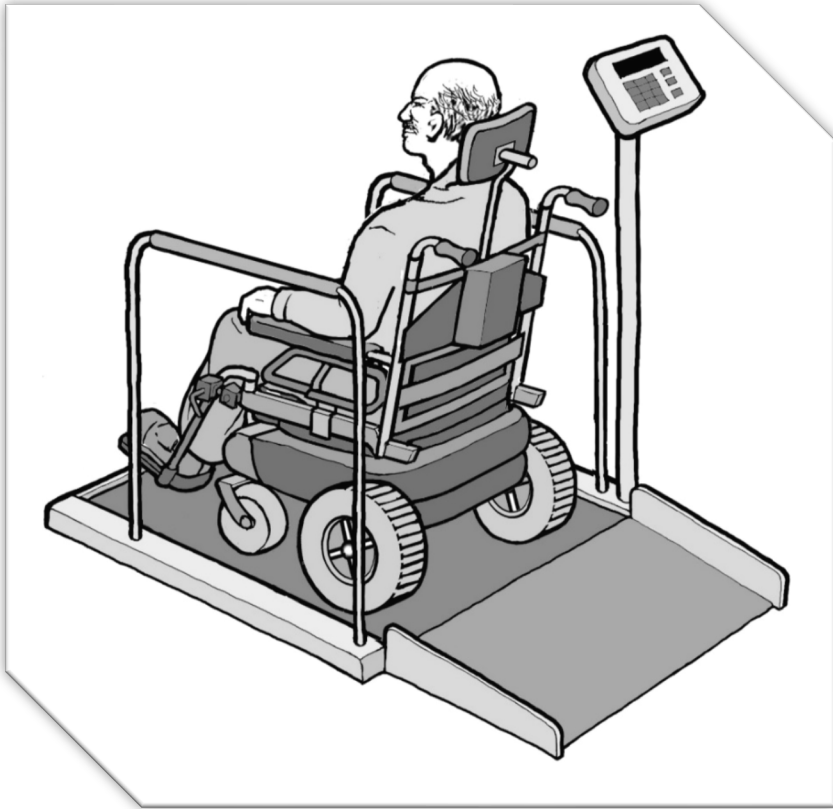
- On most equipment 4" min long
- 34" min. – 38" max.
- Above standing surface to top



Vertical Supports:

- 18" min. long
- 34" min. - 37" max.
- Above standing surface to lowest end of the gripping surface

Standing Supports (M305.3)



Horizontal Supports on weight scales with wheelchair spaces:

- One entry – gripping surface along 80% of platform length
- Pass- through:
 - Gripping surface equal to length of platform length
 - On one side only (M304.2.2 exception)

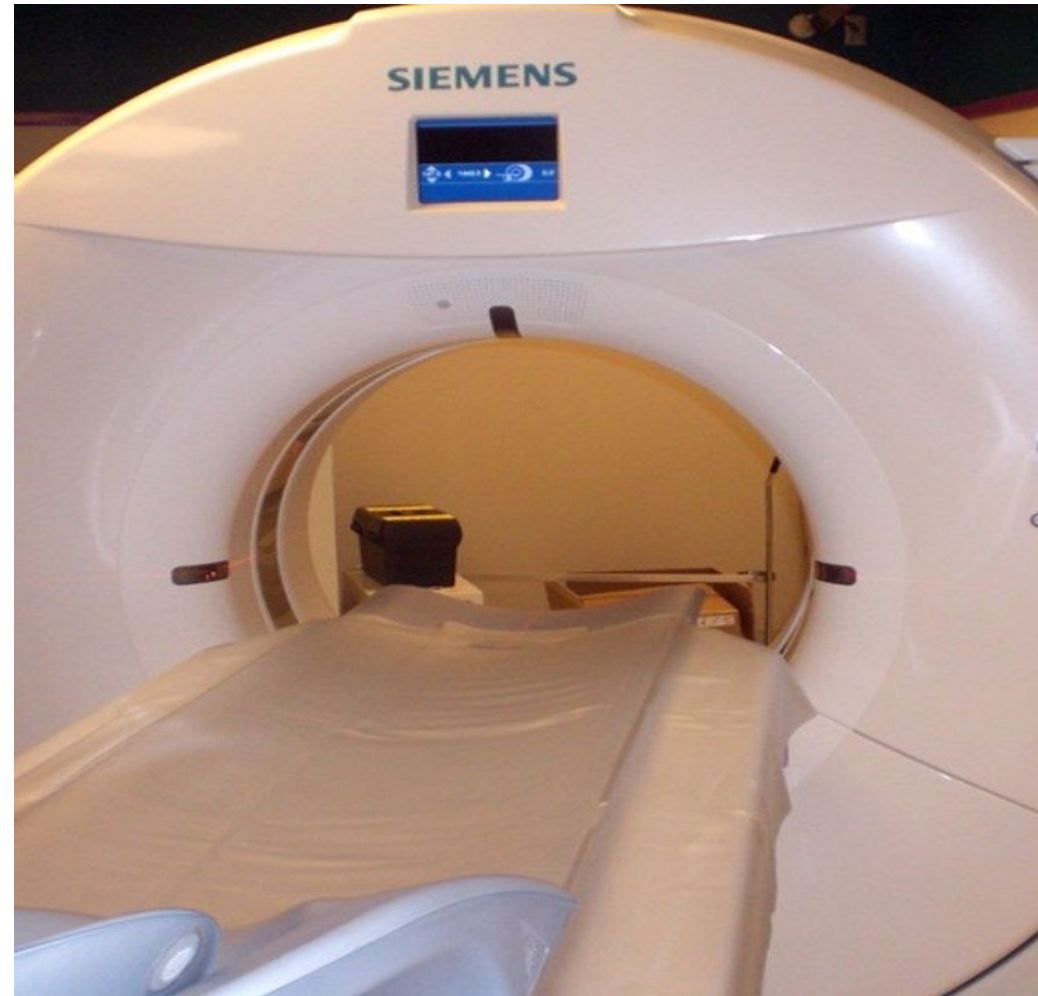
Supports

Leg supports – must provide a method of supporting, positioning, and securing the patient's legs

Head and back support – Where 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, it must be provided throughout the entire range of the incline.

Communication (M306)

- Information Communicated through the equipment
- Information provided in at least two methods:
 - audible
 - visible
 - tactile



Operable Parts (M307)

Only controls operated
by the patient

Features addressed:

- Tactilely Discernible
- Operation
- Operating Force



Medical Diagnostic Equipment Standards

The Standards for Accessible Medical Diagnostic Equipment can be found at:

<https://www.access-board.gov/mde/>

Questions?



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“Advancing Full Access and Inclusion for All”