Section 504 Federal Disability Nondiscrimination Rules: What Medical Practices Need to Know Now

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Several new federal rules expanding nondiscrimination protections for individuals with disabilities are approaching their 2026 compliance deadlines. These have significant implications for many medical practices and health systems. In 2024, the Office for Civil Rights (OCR) finalized the updates to Section 504 of the Rehabilitation Act, which governs "Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance."

The rule is intended to strengthen protections against discrimination and ensure individuals with disabilities have an equal opportunity to participate in programs or activities funded by the US Department of Health and Human Services (HHS). Among the many new

requirements, the most impactful include:

- **Accessible medical diagnostic equipment (MDE) requirement**
  - Compliance date for existing equipment (practices must have at least one accessible exam table and scale): **July 8, 2026**
- **Websites, mobile applications, and kiosks content accessibility guidelines**
  - Compliance date for employers with 15+ employees: **May 11, 2026**
  - Compliance date for employers with less than 15 employees: **May 10, 2027**
- **Medical decision making and assessment methods**

With compliance deadlines rapidly approaching, medical practices should take a proactive approach to analysis, planning, and implementation to mitigate risk and ensure continued access to care for all patients. To better understand these new requirements and how they impact your practice, please review the resources below.

Resources

- Section 504 of the Rehabilitation Act of 1973
- Section 504 of the Rehabilitation Act of 1973 Final Rule: Section by Section Fact Sheet for Recipients of Financial Assistance from HHS
- TN Department of Health Section 504 Self-Evaluation Guide Checklist
- Factsheet - New Requirements for Accessible Medical Diagnostic Equipment [PDF, 105 KB]
- Factsheet - New Requirements on the Accessibility of Web Content, Mobile Apps, and Kiosks [PDF, 135 KB]

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