



ADA Compliance Updates for Local Public Health Agencies (LPHAs)

Purpose: As governmental entities, LPHAs are required to comply with new rules under Title II of the ADA regarding the accessibility of web and mobile apps along with medical diagnostic equipment. The following is a summary of the provisions applying to LPHAs and compliance dates and information.

Medical Diagnostic Equipment Requirements

Overview

In 2024, the U.S. Department of Justice (DOJ) published a final rule under Title II of the Americans with Disabilities Act (ADA) establishing updated requirements for accessible medical diagnostic equipment (MDE). Under the Code of Federal Regulations, MDE refers to equipment used by health care professionals in medical settings for diagnostic purposes and includes items such as examination tables, examination chairs, and weight scales.

The rule incorporates accessibility standards originally developed by the U.S. Access Board, which outline specific technical and design requirements for MDE. Separately, the U.S. Department of Health and Human Services (HHS) adopted requirements extending these standards to entities receiving federal financial assistance from HHS.

Important Dates

- Must have **at least one exam table** that meets the MDE accessibility standards by **August 9, 2026**.
- Must have **at least one weight scale** that meets the MDE accessibility standards by **August 9, 2026**.
- If a practice purchases, acquires, rents, or leases MDE after October 8, 2024, the new MDE must meet the accessibility standards until the practices reaches the applicable percentage of MDE that must be accessible: **10% of total newly purchased MDE must meet accessibility standards**.

Exemptions

- **Not Currently Used in Practice:** Entities are not required to purchase compliant MDE they are not already using in their daily practice.
- **Undue Financial or Administrative Burden:** Under both existing ADA requirements and the 2024 MDE rules, LPHAs are not required to take actions that would fundamentally alter the nature of a service, program, or activity or impose an [undue financial or administrative burden](#). The burden of proof lies with the covered entity. When this exists, entities are still required to take other reasonable steps to provide access whenever possible.
- **Use of Alternate Location:** Services can be provided at an accessible location or through home visits, when appropriate. When services are provided at another location, the accessible MDE must still be readily accessible and usable by the patient. Relevant considerations may include distance, additional wait times, and whether assistance is provided between locations.

Additional Information

- **Multi-purpose equipment:** Equipment meeting accessibility standards for multiple functions (e.g., exam table and weight scale) is permitted.

- **Contracting to Provide Public Services:** Public entities remain responsible for ensuring contracted providers comply with Title II requirements.
- **Denial of Services:** Patients cannot be denied services due to lack of accessible MDE, nor can they be required to bring assistance if other patients are not.
- **Staff Training:** Staff must be trained to operate accessible MDE and assist with transfers and positioning
- **Location:** Accessible equipment must be readily available and not create delays or barriers to care.
- **Communication:** Instructions or other information necessary for the performance of the diagnostic procedure must be available in at least two formats: audible, visible, or tactile.

Documentation

- Inventory of MDE equipment should be kept, including what is accessible and non-accessible to demonstrate compliance with the 10% new equipment rule.
- Staff training logs.
- Acquisition records and/or manufacturer specs to show MDE meets standards.
- Written policies and procedures describing how MDE must be readily accessible and usable by patients with disabilities.

Key Resources

- [Exam Table Requirements \(M301 of Standards\)](#)
- [Exam Chair Requirements \(M302 of Standards\)](#)
- [Weight Scale Requirements \(M303 of Standards\)](#)
- [ADA Information Line](#)
- [ADA National Network Regional Center for TA](#)
- [ADA National Network Resources for Health Care](#)

Website & Mobile Apps

Overview:

In April 2024, the Department of Justice published a rule that sets technical requirements for state and local governments to ensure medical services, programs, and activities using web content or mobile apps conform to WCAG 2.1 Level A and Level AA accessibility standards.

Important Dates

- Population of 50,000 or more: **April 26, 2027**
- Population of less than 50,000, or any special district governments: **April 26, 2028**

Requirements

- Provide alternative text (alt text) for all non-text content.
- Provide synchronized captions for live audio streams and pre-recorded videos
- Content must be operable using a keyboard and accessible navigation.
- Color alone is not relied on to convey information or prompt an action.
- Text must have sufficient color contrast and be readable when enlarged.
- Provide descriptive page titles so users know where they are.
- Provide descriptive labels or instructions when users are required to input information.
- Text able to be resized up to 200% without loss of content/functionality.
- Multiple ways to find pages (e.g., a site map or search bar) in a way that is predictable.
- Ensure navigation components and interface elements are repeated and styled consistently throughout the site or app.
- Interactive forms and documents are also accessible.
- Content must be robust enough to work with assistive technologies like screen readers.

Exceptions

- **Archived Web Content:** Only applies to content that existed before your entity's compliance date and must meet certain [definitions](#).
- **Pre-existing Conventional Electronic Documents:** Includes PDFs, word processor, presentation, and spreadsheet file formats that existed before your compliance date but are NOT currently used to access services, programs, or activities.
- **Third-Party Posted Content:** Applies to content that has been posted by a truly unaffiliated third party not contracted by the entity.
- **Individualized, Password Protected, Conventional Electronic Documents:** document must be about a specific person, property, or account.
- **Pre-existing Social Media Posts:** Applies to content existing before compliance date.

Key Resources

- [State and Local Governments: First Steps Towards Compliance](#)
- [Determine What Needs to Comply with WCAG 2.1 Under the Rule](#)
- [Fact Sheet: New Rule on Web Content and Mobile Apps Accessibility](#)