

Preliminary Regulatory Assessment for Medical Diagnostic Equipment Accessibility Standards

Introduction

Section 510 of the Rehabilitation Act, as amended by the Patient Protection and Affordable Care Act, requires the Access Board, in consultation with the Food and Drug Administration, to issue accessibility standards that contain minimum technical criteria to ensure that medical diagnostic equipment is accessible to and useable by patients with disabilities. The statutory deadline for issuing the standards is March 23, 2012. The standards do not impose any mandatory requirements on health care providers or medical device manufacturers. However, other agencies, referred to as an enforcing authority in the standards, may issue regulations or adopt policies that require health care providers subject to their jurisdiction to acquire accessible medical diagnostic equipment that conforms to the standards.

The Access Board prepared this preliminary regulatory assessment to meet the requirements of Executive Order 13563 (Improving Regulation and Regulatory Review) and Executive Order 12866 (Regulatory Planning and Review) for the Notice of Proposed Rulemaking (NPRM) requesting public comment on the proposed standards. Among other things, Executive Order 13563 directs agencies to propose or adopt a regulation only upon a reasoned determination that its benefits justify its costs; tailor the regulation to impose the least burden on society, consistent with obtaining the regulatory objectives; and, in choosing among alternative regulatory approaches, select those approaches that maximize net benefits. Executive Order 13563 recognizes that some benefits and costs are difficult to quantify and provides that, where appropriate and permitted by law, agencies may consider and discuss qualitatively values that are difficult or impossible to quantify, including equity, human dignity, fairness, and distributive impacts.

Need for and Benefits of the Proposed Standards

The U.S. Census Bureau reports that 54.4 million Americans, about one in five U.S. residents, reported some level of disability in 2005.¹ The number of individuals with disabilities is almost equal to the combined total population of California and Florida. The U.S. Census Bureau provides this breakdown of the population of people aged 15 and older:

- 27.4 million (11.9 percent) had difficulty with ambulatory activities of the lower body;
- 22.6 million (9.8 percent) had difficulty walking a quarter of a mile;
- 21.8 million (9.4 percent) had difficulty climbing a flight of stairs;
- 10.2 million (4.4 percent) used a cane, crutches, or walker to assist with mobility;

¹ “Americans with Disabilities: 2005” (2008) available at: <http://www.census.gov/prod/2008pubs/p70-117.pdf>.

- 3.3 million (1.4 percent) used a wheelchair or other wheeled mobility device;
- 7.8 million (3 percent) had difficulty seeing words or letters in ordinary newspaper print, including 1.8 million who are completely unable to see; and
- 7.8 million (3 percent) had difficulty hearing conversations, including 1 million who are unable to hear conversations at all.

The prevalence of disability increases with age. The Administration on Aging reports that there were 39.6 million persons age 65 or older in the United States in 2009, and that this population is expected to increase to 55 million in 2020.² Among this population, 37 percent reported some type of disability in 2005.³

A national survey collected information on the types of medical equipment that is most difficult for individuals with disabilities to access and use.⁴ The survey was completed by a diverse sample of individuals with a wide range of disabilities, including mobility disabilities and sensory disabilities. Survey respondents who had experience with specific medical equipment rated their degree of difficulty when attempting to access or use the equipment as follows:

- 75 percent rated examination tables as moderately difficult to impossible to use;
- 68 percent rated radiology equipment as moderately difficult to impossible to use;
- 53 percent rated weight scales as moderately difficult to impossible to use; and
- 50 percent rated examination chairs as moderately difficult to impossible to use.

Survey respondents reported difficulties with getting on and off the equipment, positioning their bodies on the equipment, physical comfort and safety, and communication issues. Focus group sessions of individuals with disabilities reported that participants find examination tables, imaging equipment, and other diagnostic equipment not only difficult but

² “A Profile of Older Americans: 2010” available at: http://www.aoa.gov/AoARoot/Aging_Statistics/Profile/index.aspx.

³ See footnote 1.

⁴ The results of the survey are reported in Jill M. Winters, Molly Follette Story, Kris Barnekow, June Issacson Kailes, Brenda Premo, Erin Schier, Sarma Danturthi, and Jack M. Winters, “Results of a National Survey on Accessibility of Medical Instrumentation for Consumers,” in “Medical Instrumentation Accessibility and Usability Considerations,” edited by Jack M. Winters and Molly Follette Story (Boca Raton, CRC Press, 2007), 13-27.

unsafe to use, and that these negative health care experiences can result in their not scheduling regular medical examinations and diagnostic procedures.⁵

A report on the “The Current State of Health Care for People with Disabilities” issued by the National Council on Disability found that individuals with disabilities experienced significant health disparities and barriers to health care, as compared to individuals without disabilities.⁶ Among the key barriers cited in the report is the lack of accessible examination equipment. A report on the “Importance of Accessible Examination Tables, Chairs and Weight Scales” issued by the Center for Disability Issues and the Health Professions discusses how the lack of accessible equipment reduces the likelihood that individuals with disabilities will receive timely and appropriate health care.⁷ Health care providers may not perform some diagnostic procedures for patients with disabilities because they lack accessible equipment. This can result in suboptimal examinations, missed or delayed diagnoses, and worsening conditions that require more expensive and extensive treatments.

The proposed standards address many of the barriers that have been identified as affecting the accessibility and usability of diagnostic equipment by individuals with disabilities. The standards will ensure that medical diagnostic equipment is accessible to and usable by individuals with disabilities, and will allow independent entry to, use of, and exit from the equipment by such individuals to the maximum extent possible. The standards will improve the quality of health care for individuals with disabilities and ensure that they receive examinations, diagnostic procedures, and other health care services equal to those received by individuals without disabilities. The standards will facilitate independent transfers by individuals with disabilities onto and off of diagnostic equipment, and enable them to maintain their independence, confidence, and dignity. The standards will lessen the need for health care personnel to assist individuals with disabilities when transferring on and off of diagnostic equipment. Where assisted transfers are necessary, the proposed standards will also facilitate such transfers. The proposed standards will reduce the risk of injury during transfers to both health care personnel and patients.⁸ The proposed standards will result in more positive health care experiences for individuals with disabilities and health care providers.

Entities Potentially Affected by Proposed Standards

The proposed standards do not impose any mandatory requirements on health care providers or medical device manufacturers. Thus, there are no compliance costs that can be attributed to the proposed standards. As discussed below, if an enforcing authority such as the

⁵ The results of the focus group sessions are reported in Molly Follette Story, Erin Schwier, and June Issacson Kailes, “Perspectives of Patients with Disabilities on the Accessibility of Medical Equipment: Examination Tables, Imaging Equipment, Medical Chairs, and Weight Scales,” *Disability and Health Journal* 2 (2009), 169-179.

⁶ The report is available at: <http://www.ncd.gov/publications/2009/Sept302009>.

⁷ The report is available at: <http://www.cdihp.org/products.html#tables>.

⁸ Lifting and transferring patients is a major risk factor for back injury among nurses and health aides. See Alan Hedge, “Back Care for Nurses” available at: <http://www.spineuniverse.com/wellness/ergonomics/back-care-nurses>.

Department of Justice (DOJ) adopts the standards as mandatory requirements for entities subject to its jurisdiction, health care providers may experience some compliance costs. Medical device manufacturers may have an economic incentive to produce accessible products that conform to the standards for health care providers who need to acquire accessible medical diagnostic equipment.

Health Care Providers

The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act are civil rights laws that prohibit discrimination on the basis of disability. Title II of the ADA (42 U.S.C. 12131 to 12165) applies to state and local governments, and Title III of the ADA (42 U.S.C. 12189 to 12189) applies to private entities that are public accommodations such as health care providers. Section 504 of the Rehabilitation Act (29 U.S.C. 792) applies to recipients of federal financial assistance such as Medicaid and federally conducted programs.

Pursuant to the ADA and Section 504 of the Rehabilitation Act, health care providers must provide individuals with disabilities full and equal access to their health care services and facilities. DOJ has entered into settlement agreements with health care providers to enforce the ADA and Section 504 of the Rehabilitation Act. In July 2010, DOJ and the Department of Health and Human Services issued a guidance document for health care providers regarding their responsibilities to make their services and facilities accessible to individuals with mobility disabilities under the ADA and Section 504 of the Rehabilitation Act. See Access to Medical Care for Individuals with Mobility Disabilities available at: http://www.ada.gov/medcare_ta.htm. The guidance document includes information on accessible examination rooms and the clear floor space needed adjacent to medical equipment for individuals who use mobility devices to approach the equipment for transfer; accessible medical equipment (e.g., examination tables and chairs, mammography equipment, weight scales); patient lifts and other methods for transferring individuals from their mobility devices to medical equipment; and training health care personnel.

In July 2010, DOJ also issued an advance notice of proposed rulemaking (ANPRM) announcing that, pursuant to the obligation that has always existed under the ADA for covered entities to provide accessible equipment and furniture, it was considering amending its regulations implementing Titles II and III of the ADA to include specific standards for the design and use of accessible equipment and furniture that is not fixed or built into a facility in order to ensure that programs and services provided by state and local governments and by public accommodations are accessible to individuals with disabilities. See 75 FR 43452 (July 26, 2010). Among other things, the ANPRM stated that DOJ was considering amending its ADA regulations to specifically require health care providers to acquire accessible medical equipment and that it would consider adopting the standards issued by the Access Board. DOJ also indicated its intention to include in its ADA regulations scoping requirements that specify the minimum number of types of accessible medical equipment required in different types of health care facilities. If DOJ proposes to amend its ADA regulations as announced in the ANPRM, it will publish a notice of proposed rulemaking (NPRM) requesting public comment and will prepare a regulatory assessment in accordance with Executive Orders 13563 and 12866.

Medical Device Manufacturers

If DOJ amends its ADA regulations as announced in the ANPRM, medical device manufacturers may have an economic incentive to produce accessible products that conform to the standards for health care providers who need to acquire accessible medical diagnostic equipment. The size of the economic incentive will depend on the amount of accessible medical diagnostic equipment health care providers need to acquire and the manufacturers' incremental costs to design or redesign and manufacture accessible products that conform to the standards.

Many medical device manufacturers currently incorporate accessible features in some of their products such as patient support surfaces that are height adjustable, transfer and positioning supports, and scales designed for use by patients seated in a wheelchair. The incremental costs for manufacturers to conform these products to the standards are expected to be small because the features may already meet or closely meet the standards. The incremental costs may be greater for manufacturers that do not currently incorporate accessible features in their products but plan to do so in future designs or redesigns of their products. The incremental costs to design or redesign and manufacture accessible products that conform to the standards will be incurred voluntarily by manufacturers that choose to produce them for health care providers who need to acquire accessible medical diagnostic equipment. Some manufacturers may choose not to design or redesign and manufacture accessible products that conform to the standards, or may produce accessible products with less market appeal than that of their competitors, thereby losing market share and incurring losses. These economic impacts are not regulatory costs and are not generally social costs because for the most part, one manufacturer's loss is another manufacturer's gain.

The following questions in the NPRM preamble request comments on the incremental costs to design or redesign and manufacture accessible products that conform to the technical criteria in the proposed standards, as well as alternative and additional technical criteria that the Access Board is considering:

- Questions 9 and 10 on the technical criteria in Chapter M3;
- Questions 14 (a) and (b) on height adjustable patient support surfaces;
- Question 15 (b) on width of patient support surfaces on equipment used by patients in a supine, prone, or side-lying position;
- Question 18 (a) on structural strength of repositionable transfer supports;
- Question 19 (c) on location and size of transfer supports;
- Question 23 (a) on stirrups;
- Question 24 (b) on positioning supports;
- Question 29 (a) on alternative dimension for minimum depth of wheelchair spaces;

- Question 30 on edge protection for wheelchair spaces on raised platforms;
- Questions 33 on dimensions for wheelchair spaces on raised platforms;
- Question 34 (a) on alternative dimensions for toe clearance and knee clearance at wheelchair spaces;
- Question 35 (b) on handrails on diagnostic equipment ramps;
- Question 37 (c) on a folding or removable seat on weight scale platforms or other types of diagnostic equipment used by patients in a standing position;
- Question 41 (b) on audible, visible, and tactile communications; and
- Question 42 (a) on operating force for operable parts.

The Access Board will consider the information provided in the comments when preparing the final standards, and will provide an analysis of the incremental costs with the final standards.

Product Data and Unit Costs

The Access Board and its contractor, Eastern Research Group, collected product data and unit costs for a broad sample of examination tables and weight scales, including products with accessible features. The Access Board and Eastern Research Group did not evaluate the products for conformance with the proposed standards and do not endorse any of the products included in the sample. The Access Board and Eastern Research Group used the Internet to collect the product data and unit costs. Medical equipment suppliers typically list the manufacturer suggested retail price (MSRP) for the products on their web sites and sell the products at discounted prices. The discounted prices for the same product can vary widely among medical equipment suppliers. Health care providers typically purchase the products for less than the MSRP (i.e., actual price paid is less than MRSP). The unit costs in the tables below are the MSRP, and are shown as a range of lower cost and higher cost products rounded to the nearest \$50. The data shows that there are a wide variety of examination tables and weight scales available to meet almost every budget.

Product data and unit costs for examination chairs and imaging equipment will be provided when the final standards are issued.

Examination Tables

Product data and unit costs were collected for examination tables produced by five manufacturers. The manufacturer's web sites typically grouped the tables by the following

types: treatment tables, manual tables, and power tables.⁹ The number of each type of table made by the manufacturers, the number of tables included in the sample, and range of lower cost and higher cost products are summarized below.

Table Type	Products	Products in Sample	Lower Cost Products MSRP	Higher Cost Products MSRP
Treatment	74	20	\$400 - \$850	\$850 - \$1,450
Manual	15	9	\$1,250	\$2,250
Power	30	25	\$1,650 - \$2,900	\$3,650 - \$16,800

Treatment tables typically have a flat top. Some products have adjustable backrests, but the backrests typically cannot support patients in a sitting position. Treatment tables typically have a fixed height of 31 inches measured from the floor to the top of the table. The lower cost products have an open base with an H-brace or shelf. The higher cost products have cabinets, drawers, or shelves. Adjustable height treatment tables are available, but are not included in the sample. The MSRP for adjustable height treatment tables ranged from \$1,500 to \$2,400.

Manual tables typically have a fully articulated, pneumatic backrest. The backrests typically can support patients in a seated position and recline to a lying position. Manual tables typically have a fixed height of 32 inches measured from the floor to the top of the table. Manual tables typically have cabinets, drawers, or shelves.

Power tables have an electric motor that can adjust the table height to as low as 18 inches and as high as 40 inches above the floor on some products. The higher cost products have a fully articulated, pneumatic or powered, backrest that can support patients in a seated position and recline to a lying position. Some power tables have armrests, grab rails, side rails, and cabinets or drawers.

Weight Scales

Product data and unit costs were collected for weight scales produced by eight manufacturers. The scales are grouped by the following types: stand-on scales and wheelchair scales. Within each group, there are mechanical and digital scales. Unit costs are presented for stand-on scales with and without handrails. Unit costs are presented for wheelchair scales with raised platforms and with flush platforms in the floor. The number of stand-on scales and wheelchair scales made by the manufacturers, the number of scales included in the sample, and range of lower cost and higher cost products are summarized below.

Stand-On Scales	Products	Products in Sample	Lower Cost Products MSRP	Higher Cost Products MSRP
Mechanical without Handrails	22	3	\$250	\$550
Mechanical with Handrails	1	1	\$700	\$700
Digital without Handrails	50	15	\$300 - \$600	\$700 - \$1,200

⁹ Bariatric tables were not included.

Stand-On Scales	Products	Products in Sample	Lower Cost Products MSRP	Higher Cost Products MSRP
Digital with Handrails	21	9	\$600 - \$1,050	\$1,750 - \$2,600

Stand-on mechanical scales typically have a weight capacity ranging from 400 to 500 pounds. Stand-on digital scales without handrails typically have a weight capacity ranging from 400 to 750 pounds, and the higher cost products typically have larger platforms. Stand-on digital scales with handrails typically have a weight capacity ranging from 500 to 1,000 pounds, and the higher cost products typically are bariatric scales.

Wheelchair Scales	Products ¹⁰	Products in Sample	Lower Cost Products MSRP	Higher Cost Products MSRP
Mechanical with Ramped Platform	2	2	\$1,200	\$2,900
Digital with Ramped Platform	32	15	\$800 - \$1,700	\$2,100 - \$4,950
Digital with Flush Platform in Floor	8	5	\$3,300	\$6,500

Wheelchair mechanical scales with a ramped platform typically have a weight capacity ranging from 350 to 500 pounds. Wheelchair digital scales with a ramped platform typically have a weight capacity ranging from 800 to 1,000 pounds. Wheelchair digital scales with a flush platform in the floor typically have a weight capacity of 1,000 pounds. Some wheelchair digital scales have standard or optional handrails for use as a stand-on bariatric scale.

Conclusion

The Access Board has made a preliminary determination based on the preliminary regulatory assessment that the benefits of the proposed standards will justify the costs; that the proposed standards will impose the least burden on society, consistent with obtaining the regulatory objectives; and that the regulatory approach selected will maximize net benefits.

January 30, 2012

¹⁰ One of the manufacturers makes digital wheelchair scales with a ramped platform (6 models) and with a flush platform in floor (6 models). The MSRP for the wheelchair scales were not listed on the manufacturer's website or medical equipment suppliers' websites, and are not included in columns on products or products in sample.

Attachment A: Product Data and Unit Costs

The Access Board and its contractor, Eastern Research Group, collected product data and unit costs for a broad sample of examination tables and weight scales, including products with accessible features. The Access Board and Eastern Research Group did not evaluate the products for conformance with the proposed standards and do not endorse any of the products included in the sample. The Access Board and Eastern Research Group used the Internet to collect the product data and unit costs. Medical equipment suppliers typically list the manufacturer suggested retail price (MSRP) for the products on their web sites and sell the products at discounted prices. The discounted prices for the same product can vary widely among medical equipment suppliers. Health care providers purchase the products for less than the MSRP (i.e., actual price is less than MRSP). The unit costs in the tables below are the MSRP, and are shown as a range of lower cost and higher cost products rounded to the nearest \$50.

Treatment Tables			
Lower Cost Products \$400 - \$850 MSRP		Higher Cost Products \$850 - \$1,450 MSRP	
Clinton 3010	\$380	Clinton 8870	\$863
Clinton 1010	\$417	Clinton 3013	\$892
Clinton 9001	\$432	Clinton 9070	\$910
Hausmann 4002-030	\$457	Clinton 1013	\$963
Clinton 3020	\$482	Clinton 9013	\$1,032
Clinton 1020	\$497	Hausmann 4043-030	\$1,039
Ritter 95	\$561	UMF 5570	\$1,208
UMF 5588	\$624	Clinton 9133	\$1,345
Brewer 2010	\$730	UMF 5560	\$1,390
Brewer 2030	\$850	Brewer 2240	\$1,438

Treatment tables typically have a flat top. Some products have adjustable backrests, but the backrests typically cannot support patients in a sitting position. Treatment tables typically have a fixed height of 31 inches measured from the floor to the top of the table. Adjustable height products are available, but are not included in the sample.¹¹ The lower cost products have an open base with an H-brace or shelf. The higher cost products have cabinets, drawers, or shelves.

Manual Tables	
Lower Cost Products \$1,250 MSRP - Higher Cost Products \$2,250 MSRP	
UMF 5250	\$1,262
UMF 5290	\$1,350
Brewer 4000	\$1,728

¹¹ Hausman 4723 (\$2,425 MSRP <http://www.quickmedical.com/hausmann-power-plinth-treatment-table-4723.html>) and Oakworks ProLuxe Seville and Celestra PerformaLift-Rectangular Top (\$1,479 and \$2,370 MSRP <http://www.oakworks.com/electric-lift-tables.asp>) are examples of adjustable height treatment tables. Other manufacturers produce adjustable height treatment tables within the same cost range.

Hausmann 4420	\$1,754
Ritter 204	\$1,845
Midmark 604	\$1,926
Hausmann 4423	\$1,946
Hausmann 4400	\$2,258
Brewer 5000	\$2,260

Manual tables typically have a fully articulated, pneumatic backrest. The backrests typically can support patients in a seated position and recline to a lying position. Manual tables typically have a fixed height of 32 inches measured from the floor to the top of the table. Manual tables typically have cabinets, drawers, or shelves.

Power Tables			
Lower Cost Products \$1,650 - \$2,900 MSRP		Higher Cost Products \$3,650 - \$16,800 MSRP	
Clinton 80100	\$1,653	Hausmann 4430	\$3,672
Clinton 80200	\$1,793	UMF 4070	\$4,373
Clinton 80220	\$1,793	Ritter 222	\$5,499
Clinton 80330	\$1,918	UMF 4040	\$5,694
Clinton 80360	\$2,214	Hausmann 4440	\$5,776
Clinton 81100	\$2,337	Hausmann 4460	\$6,034
Clinton 81200	\$2,447	Ritter 223	\$7,036
Clinton 81220	\$2,447	Midmark 623	\$8,081
Clinton 81330	\$2,621	Midmark 625	\$8,427
Clinton 81360	\$2,917	Brewer 6500	\$8,536
		UMF 4010	\$9,349
		Ritter 230	\$11,551
		Midmark 630	\$12,884
		Brewer 7000	\$14,198
		Brewer 7500	\$16,798

Power tables have an electric motor that can adjust the table height to as low as 18 inches and as high as 40 inches, measured from the floor to the top of the table. The higher cost products have a fully articulated, pneumatic or powered, backrest that can support patients in a seated position and recline to a lying position. Some power tables have armrests, grab rails, side rails, and cabinets or drawers.

Stand-On Mechanical Scales			
Without Handrails \$250 - \$550 MSRP		With Handrails \$ 700 MSRP	
HealthoMeter 400KL	\$228	Detecto 349	\$675
SECA 700	\$295		
Detecto 337	\$538		

Stand-on mechanical scales typically have a weight capacity ranging from 400 to 500 pounds.

Stand-On Digital Scales			
Without Handrails Lower Cost Products \$300 - \$600 MSRP		With Handrails Lower Cost Products \$600 - \$1,050 MSRP	
Detecto DR400C	\$323	Charder MS2500	\$604
Detecto PD200	\$372	Befour PS8070	\$957
HealthoMeter 500KL	\$415	Detecto 6449	\$1,026
Detecto PD300	\$426		
Charder MS3900	\$459		
Detecto DR400-750	\$534		
Charder MS4900	\$547		
AmCells DRS500	\$600		
Without Handrails Higher Cost Products \$700 - \$1,200 MSRP		With Handrails Higher Cost Products \$1,750 - \$2,600 MSRP	
Befour FS0900	\$699	HealthoMeter 1100KL	\$1,725
AmCells WWS500	\$700	SR Scales SR555	\$1,822
AmCells DRS 750	\$700	HealthoMeter 4011	\$1,838
Befour FS0961 Pro-BMI	\$819	HealthoMeter 4021	\$2,075
AmCells WWS750	\$900	SECA 644	\$2,139
Detecto 6437	\$927	Detecto 6854DHR	\$2,584
SECA 763	\$1,190		

Stand-on digital scales without handrails typically have a weight capacity ranging from 400 to 750 pounds, and the higher cost products typically have larger platforms. Stand-on digital scales with handrails typically have a weight capacity ranging from 500 to 1,000 pounds, and the higher cost products typically are bariatric models.

Wheelchair Mechanical Scales with Ramped Platform	
Lower Cost Products \$1,200 MSRP - Higher Cost Products \$2,900 MSRP	
Detecto 485	\$1,191
Detecto 495	\$2,891

Wheelchair mechanical scales with a ramped platform typically have a weight capacity ranging from 350 to 500 pounds.

Wheelchair Digital Scales with Ramped Platform			
Lower Cost Products \$800 - \$1,700 MSRP		Higher Cost Products \$2,100 - \$4,950 MSRP	
Charder MS3800	\$799	SECA 674	\$2,089
LW Measurements LWC	\$900	SR Scales SR755L	\$2,358
HealthoMeter 2400KL	\$1,551	SR Scales SR725L	\$2,422
AmCells WHS	\$1,701	HealthoMeter 2700KL	\$2,449
		Detecto 6500	\$2,881
		HealthoMeter 2600KL	\$2,888

		Detecto FHD133-11	\$3,033
		SECA 664	\$3,350
		SECA 656	\$3,750
		SECA 676	\$3,950
		SECA 684	\$4,950

Wheelchair digital scales with a ramped platform typically have a weight capacity ranging from 800 to 1,000 pounds. Some products have standard or optional handrails for use as a stand-on bariatric scale.

Wheelchair Digital Scales with Flush Platform in Floor	
Lower Cost Products \$3,300 MSRP - Higher Cost Products \$6,500 MSRP	
SR Scales SR463	\$3,306
SR Scales SR463-3	\$4,140
Detecto FH133-11C	\$5,242
Detecto FH143-11C	\$5,498
Detecto FH164-11C	\$6,522

Wheelchair digital scales with a flush platform in the floor typically have a weight capacity of 1,000 pounds. Some products have standard or optional handrails for use as a stand-on bariatric scale.

Attachment B: Web Site Sources (Last Visited November 21, 2011)

The Access Board and Eastern Research Group did not evaluate these products for conformance with the proposed standards and do not endorse any of the products.

Brewer Company

Treatment Tables (9 Products)

<http://www.brewercompany.com/Products/Medical/Exam-Tables/Element-Treatment-Table.htm>

2010 – MSRP \$730

http://www.quickmedical.com/brewer_company/exam_tables/2010-element-treatment-table-flat-top.html

2030 – MSRP \$850

http://www.quickmedical.com/brewer_company/exam_tables/2030-element-treatment-table-flat-top-adj.html

2240 – MSRP \$1,438

http://www.quickmedical.com/brewer_company/exam_tables/2240-element-treatment-frame-shelf-drawers-pillow-top-adj.html

Manual Tables (4 Products)

<http://www.brewercompany.com/Products/Medical/Exam-Tables/Basic-Exam-TableUpdated.htm>

<http://www.brewercompany.com/Products/Medical/Exam-Tables/Access-Exam-TableUpdated.htm>

4000 – MSRP \$1,728

http://www.quickmedical.com/brewer_company/exam_tables/4000_4001_pelvic_tilt_drawer_warmer.html

5000 – MSRP \$2,260

http://www.quickmedical.com/brewer_company/access/5000_5001.html

Power Tables (4 Products)

<http://www.brewercompany.com/Products/Medical/Power-Tables.htm>

6500 – MSRP \$8,536

http://www.quickmedical.com/brewer_company/access/highlow_specs.html

7000 – MSRP \$14,198

http://www.quickmedical.com/brewer_company/assist/7000.html

7500 – MSRP \$16,798

http://www.quickmedical.com/brewer_company/assist/7500-power-procedure-table.html

Clinton Industries

Treatment Tables - ETA Alpha Series (4 Products)

<http://www.clinton-ind.com/medical-tables/eta-alpha/index.htm>

3010 – MSRP \$380

<http://www.quickmedical.com/clinton/medical-tables/eta-alpha-straight-line-steel-treatment-table-3010.html>

3020 – MSRP \$482

<http://www.quickmedical.com/clinton/medical-tables/eta-alpha-straight-line-steel-treatment-table-3020.html>

3013 – MSRP \$892

<http://www.quickmedical.com/clinton/medical-tables/eta-alpha-straight-line-steel-treatment-table-3013.html>

Treatment Tables - ETA Classic Series (4 Products)

<http://www.clinton-ind.com/medical-tables/eta-classic/index.htm>

1010 – MSRP \$417

http://www.quickmedical.com/clinton/medical_tables_cabinets/classic_line.html

1020 – MSRP \$497

<http://www.quickmedical.com/clinton/medical-tables/eta-classic-straight-line-treatment-table-1020.html>

1013 – MSRP \$963

<http://www.quickmedical.com/clinton/medical-tables/eta-classic-straight-line-treatment-table-1013.html>

Treatment Tables - ETA Style Line Series (4 Products)

<http://www.clinton-ind.com/medical-tables/eta-style-line/index.htm>

9001 – MSRP \$432

<http://www.quickmedical.com/clinton/medical-tables/eta-style-line-straight-line-treatment-table-9001.html>

9013 – MSRP \$1032

<http://www.quickmedical.com/clinton/medical-tables/eta-style-line-straight-line-treatment-table-9013.html>

Treatment Tables - Style Line Full Cabinet (4 Products)

<http://www.clinton-ind.com/medical-tables/eta-style-line/index.htm>

9070 – MSRP \$910

http://www.quickmedical.com/clinton/medical_tables_cabinets/style_line.html

Treatment Tables - Style Line Specialty (7 Products)

<http://www.clinton-ind.com/medical-tables/style-line-specialty/index.htm>

9133 – MSRP \$1,345

<http://www.quickmedical.com/clinton/medical-tables/style-line-specialty-laminate-treatment-table-stool-9133.html>

Treatment Tables (1 Product)

<http://www.clinton-ind.com/medical-tables/family-practice/index.htm>

8870 – MSRP \$863

<http://www.quickmedical.com/clinton-medical-exam-table-cabinet-style.html>

Power Tables - Open Base (6 Products)

<http://www.clinton-ind.com/power-tables/open-base-power-tables/index.htm>

80100 – MSRP \$1,653

<http://www.quickmedical.com/clinton-open-base-power-table.html>

80200 – MSRP \$1,793

<http://www.quickmedical.com/clinton-open-base-power-table.html>

80220 – MSRP \$1,793

<http://www.quickmedical.com/clinton-open-base-power-table-with-drop-section.html>

80330 – MSRP \$1,918

<http://www.quickmedical.com/clinton-open-base-power-table-with-drop-section.html>

80360 – MSRP \$2,214

<http://www.quickmedical.com/clinton-open-base-power-table-with-drop-section-and-stirrups.html>

Power Tables - Shrouded Base (6 Products)

<http://www.clinton-ind.com/power-tables/shrouded-power-tables/index.htm>

81100 – MSRP \$2,337

<http://www.quickmedical.com/clinton-shrouded-power-table.html>

81200 – MSRP \$2,447

<http://www.quickmedical.com/clinton-shrouded-power-table.html>

81220 – MSRP \$2,447

<http://www.quickmedical.com/clinton-shrouded-power-table-with-drop-section.html>

81330 – MSRP \$2,621

<http://www.quickmedical.com/clinton-shrouded-power-table-with-drop-section.html>

81360 – MSRP \$2,917

<http://www.quickmedical.com/clinton-shrouded-power-table-with-drop-section-and-stirrups.html>

Hausmann Industries

Treatment Tables (35 Products)

http://www.hausmann.com/product_pages/treatment_tables.html

4002-030 – MSRP \$457

<http://www.quickmedical.com/hausmann-h-brace-treatment-table.html>

4043-030 – MSRP \$1,039

<http://www.quickmedical.com/hausmann-cabinet-exam-table-shelf-divider.html>

Manual Tables (5 Products)

http://www.hausmann.com/product_pages/examination_tables.html

4420 – MSRP \$1,754

<http://www.quickmedical.com/hausmann-cabinet-exam-table.html>

4423 – MSRP \$1,946

<http://www.quickmedical.com/hausmann-pneumatic-medical-exam-table-4423-4424.html>

4400 – MSRP \$2,258

<http://www.quickmedical.com/hausmann-pneumatic-medical-exam-table.html>

Power Tables (3 Products)

http://www.hausmann.com/product_pages/examination_tables.html

4430 – MSRP \$3,672

<http://www.quickmedical.com/hausmann-econo-line-exam-table.html>

4440 – MSRP \$5,776

<http://www.quickmedical.com/hausmann-powermatic-power-exam-table.html>

4460 – MSRP \$6,034

<http://www.quickmedical.com/hausmann-wheelchair-accessible-exam-table.html>

Midmark Corporation

Treatment Tables (2 Products)

<http://www.midmark.com/en-us/MedicalProducts/ManualExaminationTables/Pages/default.aspx#>

Ritter 95 – MSRP \$561

<http://www.anthonyproducts.com/store/p-287-ritter-95-treatment-table.aspx>

Manual Tables (2 Products)

<http://www.midmark.com/en-us/MedicalProducts/ManualExaminationTables/Pages/default.aspx#>

Ritter 204 – MSRP \$1,845

<http://www.medicalresources.com/shopping/proddisplay.asp?catalogid=8351>

Midmark 604 – MSRP \$1,926

<http://www.medicalresources.com/shopping/proddisplay.asp?catalogid=8356>

Power Exam Tables (4 Products)

<http://www.midmark.com/en-us/MedicalProducts/PowerExaminationTables/Pages/default.aspx#>

Ritter 222 – MSRP \$5,499

<http://www.medicalresources.com/shopping/proddisplay.asp?catalogid=3920>

Ritter 223 – MSRP \$7,036

<http://www.medicalresources.com/shopping/proddisplay.asp?catalogid=5769>

Midmark 623 – MSRP \$8,081

<http://www.medicalresources.com/shopping/proddisplay.asp?catalogid=5759>

Midmark 625 – MSRP \$8,427

<http://www.medicalresources.com/shopping/proddisplay.asp?catalogid=14745>

Power Procedures Tables (2 Products)

<http://www.midmark.com/en-us/MedicalProducts/PowerProceduresTables/Pages/default.aspx#>

Ritter 230 – MSRP \$11,551

<http://www.medicalresources.com/shopping/proddisplay.asp?catalogid=8448>

Midmark 630 – MSRP \$12,884

<http://www.medicalresources.com/shopping/proddisplay.asp?catalogid=8451>

UMF Medical

Treatment Tables (4 Products)

<http://www.umf-exam.com/index.php?page=treatment-orthopedic-tables>

5588 – MSRP \$624

<http://www.medicaldevicedepot.com/UMF-H-Brace-Treatment-Table-350-lb-capacity-p/5588.htm>

5570 – MSRP \$1,208

<http://www.medicaldevicedepot.com/UMF-Treatment-Table-Standard-Premium-Top-p/5570.htm>

5560 – MSRP \$1,390

<http://www.medicaldevicedepot.com/UMF-5560-Treatment-Table-Standard-Premium-Top-p/umf-5560.htm>

Manual Tables (4 Products)

<http://www.umf-exam.com/index.php?page=signature-series-exam-tables>

5250 – MSRP \$1,262

<http://www.medicaldevicedepot.com/UMF-5250-Signature-Series-Exam-Table-p/5250.htm>

5290 – MSRP \$1,350

<http://www.examtablesforsale.com/umf-5290.html>

Power Exam & Procedures Tables (7 Products)

<http://www.umf-exam.com/index.php?page=power-procedure-tables>

4070 – MSRP \$4,373

<http://www.medicaldevicedepot.com/UMF-4070-Power-Hi-Lo-Manual-Back-Exam-Table-p/4070.htm>

4040 – MSRP \$5,694

<http://www.medicaldevicedepot.com/UMF-4040-Power-Hi-Lo-Power-Back-Exam-Table-p/4040.htm>

4010 – MSRP \$9,349

<http://www.medicaldevicedepot.com/UMF-4010-Power-Procedure-Table-with-Hand-Controls-p/4010.htm>

AmCells Corp

<http://www.amcells.com/sp/Products1.html>

Stand-On Digital Scales (4 Products, TRS Discontinued)

DRS500 – MSRP \$600

<http://www.quickmedical.com/amcells/wws.html>

WWS500 – MSRP \$700

<http://www.quickmedical.com/amcells/wws-500-lb-capacity-doctor-scale.html>

DRS750 – MSRP \$700

<http://www.quickmedical.com/amcells/drs-750-lb-capacity-doctor-scale.html>

WWS750 – MSRP \$900

<http://www.quickmedical.com/amcells/wws-750-lb-capacity-doctor-scale.html>

Befour¹²

<http://www.befour.com/products/list.asp?type=club>

<http://www.befour.com/products/list.asp?type=port>

<http://www.befour.com/products/list.asp?type=long>

Stand-On Digital Scales (13 Products)

FS0900 – MSRP \$699

<http://www.quickmedical.com/befour/0900.html>

FS0961 Pro-BMI – MSRP \$819

<http://www.quickmedical.com/befour/0961bmi.html>

Stand-On Digital Scales with Handrails (6 Products)

PS8070 – MSRP \$957

<http://www.quickmedical.com/befour-high-capacity-handrail-scale-portable-ps-8070.html>

Charder Electronic Co.

http://www.taiwantrade.com.tw/chardermmedical/products-list/en_US/39950/Professional_Care

http://www.taiwantrade.com.tw/chardermmedical/products-list/en_US/39952/Senior_%26_Abled

Stand-On Digital Scales (2 Products)

MS3900 – MSRP \$459

<http://www.quickmedical.com/summit/s3900-digital-column-scale-height-rod.html>

¹² Befour makes digital wheelchair scales with a ramped platform (6 models) and with a flush platform in floor (6 models). The MSRP for the wheelchair scales were not listed on the manufacturer's website or medical equipment suppliers' websites, and they are not included in the sample.

MS4900 – MSRP \$547

<http://www.quickmedical.com/charder-digital-column-scale-height-rod-printer-ms4900.html>

Stand-On Digital Scales with Handrails (1 Product)

MS2500 – MSRP \$604

<http://www.quickmedical.com/charder-digital-handrail-scale-2500.html>

Detecto

<http://www.detecto.com/physicians.htm>

<http://www.detecto.com/bariatric.htm>

Stand-On Mechanical Scales (14 Products)

337 – MSRP \$538

<http://www.quickmedical.com/detecto/physician/337.html>

Stand-On Mechanical Scales with Handrails (1 Products)

349 – MSRP \$675

<http://www.quickmedical.com/detecto/physician/349.html>

Stand-On Digital Scales (18 Products)

DR400C – MSRP \$323

http://www.affordablescales.com/scales_category.asp?products=8&Physician_Scales

PD200 – MSRP \$372

<http://www.quickmedical.com/detecto/fitness/pd200-professional-space-saving-scale.html>

PD300 – MSRP \$426

<http://www.quickmedical.com/detecto/physician/pd300dhr-professional-doctor-scale.html>

DR400-750 – MSRP \$534

http://www.quickmedical.com/detecto/specialty/dr400_750.html?openTab=Accessories

6437 – MSRP \$927

<http://www.quickmedical.com/detecto/physician/6437.html>

Stand-On Digital Scales with Handrails (5 Products)

6449 – MSRP \$1,026

<http://www.quickmedical.com/detecto-high-capacity-digital-physician-scale-height-rod-6449.html>

6854DHR – MSRP \$2,584

<http://www.quickmedical.com/detecto-high-capacity-digital-handrail-scale-heightrod-6854dhr.html>

HealthoMeter

<http://www.homscales.com/products/Physician%20Scales/1.aspx>

<http://www.homscales.com/products/Physician%20Scales/2.aspx>
<http://www.homscales.com/products/Acute%20Care%20Scales/Stand-On-Scales.aspx>
<http://www.homscales.com/products/Bariatric%20Scales/1.aspx>

Stand-On Mechanical Scales (5 Products)

400KL– MSRP \$228

http://www.quickmedical.com/health_o_meter/beam-scales/400kl-physician-beam-scale.html

Stand-On Digital Scales (8 Products)

500KL – MSRP \$415

http://www.quickmedical.com/health_o_meter/fitness-scale-500kl.html

Stand-On Digital Scales with Handrails (4 Products)

1100KL– MSRP \$1,725

<http://www.quickmedical.com/healthometer-high-capacity-digital-handrail-scale-1100kl.html>

4011–MSRP \$1,838

<http://www.scalesonline.com/2520/category/Healthometer-4011-Handrail-Scale.aspx>

4021– MSRP \$2,075

<http://www.scalesonline.com/2522/Health%20O%20Meter/Healthometer-4021-Handrail-Scale.aspx>

SECA

http://www.seca.com/english/us/home/products/details/seca/category/column_scales_264/

http://www.seca.com/english/us/home/products/details/seca/category/multifunction_and_wheelchair_scales_267/

Stand-On Mechanical Scales (3 Products)

700 – MSRP \$295

http://www.quickmedical.com/seca/scales/700-mechanical_column_scale_measuring_rod.html

Stand-On Digital Scales (5 Products)

763 – MSRP \$1,190

<http://www.quickmedical.com/seca/scales/763-digital-medical-scale.html>

Stand-On Digital Scales with Handrails (2 Products)

644 – MSRP \$2,139

<http://www.quickmedical.com/seca/specialty/644.html>

SR Scales

<http://www.srinstruments.com/Scales/Item-Display.asp?URI=1124>

Stand-On Digital Scales with Handrails (3 Products)

SR555 – MSRP \$1,822

<http://www.medicalsolutionsinc.com/ProductsDetails/5/233/218946-Laboratory%20Equipment.aspx>

AmCells Corp

<http://www.amcells.com/sp/Products1.html>

Wheelchair Digital Scales with Ramped Platform (1 Product)

WHS – MSRP \$1,701

<http://www.quickmedical.com/amcells-wheelchair-scale-whs.html>

Charder Electronic Co.

http://www.taiwantrade.com.tw/chardermedical/products-list/en_US/39952/Senior_%26_Abled

Wheelchair Digital Scales with Ramped Platform (1 Product)

MS3800 – MSRP \$799

<http://www.quickmedical.com/summit/s3800-wheelchair-scale.html>

Detecto

<http://www.detecto.com/wheelchairs.htm>

Wheelchair Mechanical Scales with Ramped Platform (2 Products)

485 – MSRP \$1,191

<http://www.quickmedical.com/detecto/specialty/485.html>

495 – MSRP \$2,891

<http://www.quickmedical.com/detecto/specialty/495.html>

Wheelchair Digital Scales with Ramped Platform (6 Products)

6500 – MSRP \$2,881

<http://www.quickmedical.com/detecto-portable-high-capacity-bariatric-wheelchair-scale-6500.html>

FHD133-11 – MSRP \$3,033

<http://www.quickmedical.com/detecto/specialty/FHD133II.html>

Wheelchair Digital Scales with Flush Platform in Floor (4 Products)

FH133-11C – MSRP \$5,242

<http://www.quickmedical.com/detecto-in-floor-medical-scale.html>

FH143-11C – MSRP \$5,498

<http://www.quickmedical.com/detecto-in-floor-medical-scale.html>

FH164-11C – MSRP \$6,522

<http://www.quickmedical.com/detecto-in-floor-medical-scale.html>

HealthoMeter

<http://www.homscales.com/products/Acute%20Care%20Scales/Wheelchair-Scales.aspx>

<http://www.homscales.com/products/Bariatric%20Scales/1.aspx>

Wheelchair Digital Scales with Ramped Platform (12 Products)

2400KL – MSRP \$1,551

<http://www.quickmedical.com/healthometer-portable-digital-remote-display-wheelchair-ramp-rail-scale-2400kl.html>

2700KL – MSRP \$2,449

<http://www.quickmedical.com/healthometer-portable-digital-remote-display-wheelchair-ramp-scale-2700kl.html>

2600KL – MSRP \$2,888

http://www.quickmedical.com/health_o_meter/2600kl.html

LW Measurements

<http://lwmeasurements.com/lwclargewheelchairscale/>

Wheelchair Digital Scales with Ramped Platform (1 Product)

LWC – MSRP \$900

http://www.affordablescales.com/scales_specs.asp?specs=4830&LW_Measurements_LWC

SECA

http://www.seca.com/english/us/home/products/details/seca/category/multifunction_and_wheelchair_scales_267/

Wheelchair Digital Scales with Ramped Platform (5 Products)

674 – MSRP \$2,089

<http://www.quickmedical.com/seca/specialty/674.html>

664 – MSRP \$3,350

<http://www.quickmedical.com/seca/specialty/664.html>

656 – MSRP \$3,750

<http://www.quickmedical.com/seca/specialty/medical-stretcher-scale-656.html>

676 – MSRP \$3,950

<http://www.quickmedical.com/seca/specialty/676.html>

684 – MSRP \$4,950

<http://www.quickmedical.com/seca/specialty/684.html>

SR Scales

<http://www.srinstruments.com/Scales/Item-Display.asp?URI=1129>

<http://www.srinstruments.com/Scales/Item-Display.asp?URI=1228>

Wheelchair Digital Scales with Ramped Platform (6 Products)

SR755L – MSRP \$2,358

<http://www.quickmedical.com/srscales/sr755.html>

SR725L – MSRP \$2,422

<http://www.quickmedical.com/srscales/sr725.html>

Wheelchair Digital Scales with Flush Platform in Floor (4 Products)

SR463 – MSRP \$3,306

<http://www.quickmedical.com/srscales/sr465.html>

SR463-3 – MSRP \$4,140

<http://www.quickmedical.com/srscales/platform-scales/sr4633-infloor-scale-system.html>