



ROTEC

Are Your Hospital Beds Compliant with Section 504?

Designing Bariatric Care Around the Patient

SECTION 504

— AT A GLANCE —



LEGAL BACKGROUND

Section 504 of the Rehabilitation Act of 1973 prohibits disability-based discrimination by any program receiving federal funding.



OBESITY AS A DISABILITY

2024 HHS regulations add obesity to the definition of “disability” under Section 504.



REASONABLE ACCOMMODATIONS

Covered entities must provide modifications, aids, and services to ensure equal access.



IMPLICATIONS

Healthcare providers may need to offer bariatric equipment, adjustable beds, or imaging alternatives.

For healthcare organizations, accessibility is both a regulatory requirement and an opportunity to enhance the compassionate delivery of patient care. By prioritizing accessibility, hospitals can give each patient easier access to the environments, equipment, and care they need.

Recent updates to Section 504 of the Rehabilitation Act of 1973 put a finer point on the matter. Healthcare leaders must now translate accessibility and reasonable accommodations into the everyday care environment, especially for patients of size.

Both clinical experts and patient advocates agree: specific bariatric accommodations can profoundly impact caregivers and patients alike. The insights shared here underscore the importance of accessible care for bariatric patients in every care environment. With support from the bariatric bed innovators at Rotec, healthcare leaders can start making accommodations where it has the most impact: in the patient’s room.

“When you have the right equipment, you don’t have to make accommodations on the fly for patients of different sizes. Being prepared ahead of time makes clinical workflows much easier.”

**Jimbo Varum,
DHA, MBA, RRT-NPS-ACCS, CSPHA, CBCA**

Section 504 and the Changing Expectations for Bariatric Care

For more than 50 years, Section 504 of the Rehabilitation Act of 1973 has prohibited disability discrimination in programs and activities receiving federal financial assistance from the U.S. Department of Health and Human Services (HHS). In 2024, HHS updated its implementing regulation, strengthening and clarifying how these Section 504 protections apply within healthcare.¹

The Final Rule strengthens protections across healthcare, including requirements related to medical treatment, reasonable modifications to policies and practices, program accessibility, and accessible medical diagnostic equipment (MDE).^{1,2}

Importantly for bariatric care, the Final Rule also clarifies that **obesity may constitute a physical impairment under Section 504**, even without accompanying morbidities.¹

For healthcare leaders, this clarification begs a critical question: **what does reasonable accommodation look like in practice for patients of size?**

Regulatory readiness is only part of the equation. The true test of meaningful accessibility occurs when a bariatric patient actually enters the care environment. It's the care team and patient experience during routine care that matter most.

"It's the role of the healthcare professional or leadership to put together meaningful access for patients of size, starting with the seat of custodial care: the patient room."

Dr. Susan Gallagher,
PhD, MSN, MA, RN, CBN, CSPHP, CBCA



What Reasonable Accommodation Looks Like in Clinical Practice

For clinicians, reasonable accommodation is a practical question: is the care environment prepared to safely support the patient in front of them? According to bariatric-care expert Susan Gallagher, PhD, MSN, MA, RN, CBN, CSPHP, CBCA, that preparation begins long before a patient reaches the hospital bed.³

“Reasonable accommodation starts in the parking lot,” Gallagher stresses. “Are there spaces large enough for them to get out of their car with ease? Are there chairs or benches on the walk to the entrance where the patient can sit comfortably?”

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By the time the patient reaches the point of care, a lack of accommodation becomes more sharply apparent. Jimbo Varnum, DHA, MBA, RRT-NPS-ACCS, CSPHA, CBCA, offers a recent example.³

“A hospital I visited had a patient of size come in over the weekend. They didn’t have a bariatric bed to accommodate him, so they put him in a standard bed. The problem is, the head of the bed couldn’t rise high enough because the patient was over the supported weight limits. They had to stack pillows behind the patient’s head to keep him propped up all weekend until a bariatric bed arrived the following week.”

Comfort issues aside, cases like this highlight the safety concerns when appropriate resources are not available for bariatric patients. “Many bariatric patients have respiratory issues, and lying down flat isn’t good for them,” shares Varnum. “Without a proper bed that can raise their head, the patient may require a ventilator which can cause a domino effect of sequelae.”

In addition, patients of size are already at a greater risk of falling than patients of average weight.⁴ Without reasonable accommodations to reduce the risk of falls, it can result in injuries for patients and caregivers alike.^{4,5}

Healthcare organizations must prioritize equipment that is purpose-built for both bariatric patients and the clinicians who care for them. Appropriate capacity, dimensions, positioning, and accessibility can all influence the safe, efficient delivery of care. For patients of size, those accommodations are felt on a deeply personal level.

The Patient Perspective: When Accommodation Becomes Experience

For patients of size, reasonable accommodation is not experienced as a regulatory requirement or a policy on paper. They experience it through the physical environment, the equipment available to support them, and their ability to participate in their own care with safety and dignity.

For bariatric consultant and patient advocate Tracey Carr, the issue is personal. "As both an advocate and a person of size myself, I see a common assumption among many clinical and medical staff," says Carr. "They assume that when I walk into a facility, I want someone to hit a big button that says 'Big Person Entering,' and for lots of special accommodations to kick in and fall into place."⁶

The reality couldn't be further from the truth. **"We want business as usual,"** Carr shares. **"Not special treatment."**

Meaningful accommodation should allow every patient to access the care they need without their body size becoming the defining focus of the patient experience. That means the same equipment must support the needs of each patient, regardless of whether they weigh 125 pounds or 325.

That need is most clearly apparent when you consider the hospital bed. Carr explains:

"It's hard to overstate how important a bed is to a patient. It's the fundamental piece of equipment you have as an in-patient. If an organization can't supply me with a comfortable bed I can move around in and get in and out of, I absolutely call into question everything else they're planning for me."⁶

For bariatric patients, appropriate dimensions, positioning, stability, and accessibility aren't just "nice-to-have" features. They're the foundation of confidence in the care being provided. When equipment is not thoughtfully engineered to support patients of size, trust can erode quickly.

"Listening for sounds that equipment is straining is something larger people do on a regular basis," Carr shares. "It matters deeply that a piece of equipment doesn't groan or make sounds or suggest it's under load when I first sit or lie down on it."⁶

Structural performance is as much a question of patient confidence and clinical capability as it is of regulatory readiness. By making the switch to purpose-built bariatric equipment, healthcare organizations can make accessibility and the compassionate delivery of care an organizational priority.

"You've got to get the bed right if you want to convince me that you know what you're doing with my body."⁶

Tracey Carr
Bariatric Consultant & Patient Advocate



Engineering Meaningful Accommodation Into the Care Environment

Meaningful accommodation depends in part on equipment designed around the needs of both patients and clinicians. For more than 40 years, Rotec has designed hospital beds around those evolving needs. By actively seeking input from healthcare professionals and bariatric specialists, Rotec continues to engineer solutions that proactively meet challenges within the care environment.

Rotec's VersaTech Bariatric Bed reflects that approach, combining a weight capacity of up to 1,100 lbs with expandable dimensions and an industry-leading, ultra-low platform height of just 8".⁷

These features matter beyond their specifications. An ultra-low platform can reduce the distance of a potential fall⁸ and support patients getting into and out of bed. Expandable dimensions accommodate different body sizes, while appropriate weight capacity and durable construction provide reliable structural support throughout care.⁷

The benefits of Rotec's tailored approach to bariatric care extend to caregivers, as well. Rotec's optional VersaDrive System provides powered assistance to reduce the effort required to transport the bed through the care environment.^{9,10}



The HHS Final Rule strengthens protections intended to ensure meaningful access to healthcare and other covered programs for individuals with disabilities.¹ While no single piece of equipment can establish Section 504 compliance, Rotec's thoughtfully designed bariatric equipment can support an organization's broader approach to accessibility and reasonable accommodation.

True bariatric readiness, however, extends beyond equipment. It requires organizations to consider the clinicians using it, the patients relying on it, and the systems supporting both. Through equipment designed around clinical and patient needs, along with ongoing support and collaboration, Rotec can help healthcare organizations strengthen their approach to safer, more accessible patient care.

The expansion of Section 504 brings the bariatric patient experience to a new level of awareness, with a clear path towards what Tracey Carr envisions as the best possible outcome of universal accessibility for all patients.

As she explains, "I just want a bed that looks like everyone else's does and fits my body. It's the key to feeling physically and emotionally supported and that you're understood, respected, and anything that fits people from 95-600 pounds is ideal because then I'm just another human being. Beds that fit everyone send a message that you're acceptable as a person, and that an organization really cares about you."

***"Rotec's beds are so beautifully engineered, they don't audibly strain when a bariatric patient enters the bed."*⁶**

Tracey Carr
Bariatric Consultant & Patient Advocate





About Rotec

With over 40 years of dedication to applying industry best practices in close collaboration with healthcare professionals, Rotec consistently meets the highest standards of care. We firmly believe that patients and their families deserve nothing but the best care, maximum comfort, autonomy, and dignity. We understand that nurses and caregivers rely on equipment that gives them the confidence and security to deliver optimal well-being to their patients. Our patented innovations stand as a testament to our unwavering dedication and expertise.

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