

FY26 VPAT and Accessibility Conformance Report (ACR) Evaluation Rubric

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Instructions

When a vendor fills out a VPAT, the resulting document is known as an Accessibility Conformance Report (ACR). This rubric contains all the criteria useful for evaluating a filled-out Voluntary Product Accessibility Template (VPAT). This rubric assigns one of three states to each criteria:

- Pass
- Fail
- More Details Needed

In each of the tables below, there are details about each criteria, along with what evidence is needed to support a finding of “Pass”, “Fail”, or “More Details Needed”. In evaluating a full ACR, the evaluator calculates the total number of Passes and Fails, with each Pass = 1, and each Fail = 0. The total score is evaluated using the traditional grading schema of A-F: 90% = A, 80% = B, 70% = C, 60% = D, below 60% = F. More Details Needed are neutral, and

can be used to assess whether to ask the vendor for more information on a criteria the ACR fails, in hopes of reaching a Pass state.

An ACR must have a score of 80% or better to be considered for moving ahead with a purchase. If an ACR falls in the 70-80% range, OR there are a significant number of “More Details Needed” in the evaluation, the evaluator has the discretion to volunteer to perform an independent audit at a cost to the vendor.

At the discretion of the client, the State of Minnesota 1-5 scoring system may be used in place of this system. In using that system, the evaluator will use the State of Minnesota “VPAT Evaluation Scoring for RFPs, v 3.0” in its entirety.

Please note that complex systems, such as systems that have both a web application and a mobile application, may require more than one ACR.

For questions about this rubric, please contact:

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ACR Scoring Rubric Details

CRITERIA	PASS	FAIL
Version: does the VPAT template being used include the Section 508 criteria?	If so, then pass.	If not, then fail.
Date: was the VPAT updated in the last 24 months?	If so, then pass.	If not, then fail.
Template: is the VPAT template being used either 2.5?	If so, then pass.	If not, then fail. Please note: as of 2026, VPAT Template 2.4 is no longer being accepted.
NDA: Are individuals required to sign an NDA before accessing the completed ACR?	If not, then pass.	If so, then fail. If individuals are required to provide additional information or register with the vendor, then “More Details Needed”.

Product Information: Is the product name and version correct?	If so, then pass.	If both are incorrect, then fail. If one is incorrect, then “More Details Needed”.
Contact information: does the ACR contain accurate contact information for follow-up?	If ACR contains an individual’s name, email, and phone number, then pass.	If ACR contains nothing, or no individual’s name, then fail. If ACR contains partial contact information, then “More Details Needed”.
Evaluation Party: Was the evaluation conducted by a respected third party?	If testing was done by an independent accessibility auditing company or a dedicated accessibility specialist within the company (name and contact details provided), then pass.	If testing was done by an unknown party or by the product team themselves, then fail.
Evaluation Method: Is the evaluation method specified?	If testing includes both automated and manual testing, including assistive technology details, then pass.	If testing does not include automated and manual testing with details of assistive technology, then fail.
Conformance Levels: Are conformance levels noted and explained?	If conformance levels are noted, and include WCAG 2.2 A and AA, as well as Section 508 Chapter 6 and Chapter 3 (as applicable), then pass.	If conformance levels are not noted, or do not include WCAG 2.2 A and AA, then fail. If conformance levels are WCAG 2.1, or are missing Section 508 requirements, then More Details Needed.
Notes: Are detailed, accurate notes provided?	If notes are detailed and accurate, then pass.	If notes are missing or contain concerning statements (e.g., only automated testing was used, an application won’t be used by people with disabilities, or key parts of the product were excluded from the ACR because they weren’t accessible), then fail.
WCAG Tables: Are all WCAG tables included?	If WCAG tables for all 13 guidelines are included, then Pass.	If tables are incomplete, then fail.

<p>Completed Tables: Are all tables completed in full?</p>	<p>If all tables have been completed in full, then Pass.</p>	<p>If not all tables have been completed in full, then fail.</p>
<p>Section 508: Are all requirements of Section 508 Chapter 6 included and completed in full?</p>	<p>If all requirements as laid out in Section 508 Chapter 6, “Support Documentation and Services” are included and completed in full, then pass.</p>	<p>If not all requirements as laid out in Section 508 Chapter 6 are included, then fail.</p> <p>If some but not all requirements as laid out in Section 508 Chapter 6 are included, then More Details Needed.</p>
<p>Not Applicable Remarks: Any items that have been marked “Not Applicable” have detailed notes, and make sense in the context of the product.</p>	<p>If all items that have been marked “Not Applicable” have detailed notes and make sense, then Pass.</p>	<p>If any items that have been marked “Not Applicable” lack notes, then fail.</p> <p>If any items that have been marked “Not Applicable” have confusing notes or seem to be applicable, then More Details Needed.</p>
<p>Level Documentation: Are all items marked as Supports / Partially Supports / Not Supported accompanied by detailed notes?</p>	<p>If all items that have been marked as Supports / Partially Supports / Not Supported have detailed notes, then Pass.</p> <p>These details should contain the following information based on support level:</p> <ul style="list-style-type: none"> • Supports: How the product supports the criterion (e.g., what accessibility features or techniques are implemented) • Partially supports: What accessibility techniques are 	<p>If any items are marked as Supports / Partially Supported / Not Supported and lack detailed notes, then fail.</p> <p>If any items are marked as Supports / Partially Supports / Not Supported and contain notes that indicate the reviewer may not understand the criteria, then More Details Needed.</p>

	<p>implemented, and any exemptions (including the location of, and a description for, these exemptions)</p> <ul style="list-style-type: none"> • Does not support: Which aspects of the product do not support the criterion (including a description of these aspects) 	
<p>Conformance Matching: do any items marked as “Supports” contain notes that lead an evaluator to believe otherwise?</p>	<p>If no items are marked as “Supports” but have notes that indicate otherwise, then mark as Pass.</p>	<p>If any items are marked as “Supports” but have notes that indicate otherwise, then mark as Fail, and ask for more details.</p>

ACR Scoring Rubric: Mentimeter

CRITERIA	PASS	FAIL	NOTES
Version	X		
Date	X		February 2026
Template	X		2.5INT
NDA	X		
Legal Disclaimer		X	Legal disclaimer rejected.
Product Information		X	Missing version information, also none of this applies to the web version?
Contact information		X	suppor@mentimeter.com
Evaluation Party		X	
Evaluation Method		X	“General Product Knowledge”
Conformance Levels	X		
Notes	X		
WCAG Tables	X		
Completed Tables	X		
Section 508		X	Includes information for Chapters 3 and 6. Spurious note for missing Chapter 5 information.
Not Applicable Remarks	X		
Level Documentation		X	
Conformance Matching	X		
TOTAL:	10	7	59%. This is a D-grade ACR.

WCAG 2.2 A Guideline Evaluations

GUIDELINE	PASS	FAIL	COMPLETE	DETAILS
1.1.1 Non-text content	X		X	
1.2.1 Audio-only and Video-only (Pre-recorded)	X		X	N/A with note
1.2.2 Captions (Pre-recorded)	X		X	N/A with note
1.2.3 Audio Description or Media	X		X	N/A with note

Alternative (Pre-recorded)				
1.3.1 Info and Relationships	X		X	
1.3.2 Meaningful Sequence	X		X	
1.3.3 Sensory Characteristics	X		X	
1.4.1 Use of Color	X		X	
1.4.2 Audio control	X		X	
2.1.1 Keyboard	X		X	
2.1.2 No Keyboard Trap	X		X	
2.1.4 Character Key Shortcuts	X		X	N/A with note
2.2.1 Timing Adjustable	X		X	
2.2.2 Pause, Stop Hide	X		X	
2.3.1 Three Flashes or Below	X		X	
2.4.1 Bypass Blocks	X		X	
2.4.2 Page Titled	X		X	
2.4.3 Focus Order	X		X	
2.4.4 Link Purpose (In Context)	X		X	
2.5.1 Pointer Gestures	X		X	
2.5.2 Pointer Cancellation	X		X	
2.5.3 Label in Name	X		X	
2.5.4 Motion Actuation	X		X	N/A with note
3.1.1 Language of Page	X		X	
3.2.1 On Focus	X		X	

3.2.2 On Input	X		X	
3.2.6 Consistent Help	X		X	
3.3.1 Error Identification	X		X	
3.3.2 Labels or Instructions	X		X	
3.3.7 Redundant Entry	X		X	
4.1.2 Name, Role, Value	X		X	

WCAG 2.2 AA Guideline Evaluations

GUIDELINE	PASS	FAIL	COMPLETE	DETAILS
1.2.4 Captions (Live)	X		X	N/A with note
1.2.5 Audio Description (Pre-recorded)	X		X	N/A with note
1.3.4 Orientation	X		X	
1.3.5 Identify Input Purpose	X		X	
1.4.3 Contrast (Minimum)	X		X	
1.4.4 Resize Text	X		X	
1.4.5 Images of Text	X		X	
1.4.10 Reflow	X		X	
1.4.11 Non-Text Contrast	X		X	
1.4.12 Text Spacing	X		X	
1.4.13 Content on Hover Focus	X		X	
2.4.5 Multiple Ways	X		X	N/A with note
2.4.6 Headings and Labels	X		X	
2.4.7 Focus Visible	X		X	

2.4.11 Focus Not Obscured (Minimum)	X		X	
2.5.7 Dragging Movements	X		X	
2.5.8 Target Size Minimum	X		X	
3.1.2 Language of Parts	X		X	
3.2.3 Consistent Navigation	X		X	
3.2.4 Consistent Identification	X		X	
3.3.3 Error Suggestion	X		X	
3.3.4 Error Prevention (Legal, Financial, Data)	X		X	
3.3.8 Accessible Authentication (Minimum)	X		X	
4.1.3 Status Messages	X		X	

Section 508

Chapter 3: Functional Performance Criteria

Criteria	Pass/Fail	Details
302.1 Without Vision	Pass	
302.2 With Limited Vision	Pass	
302.3 Without Perception of Color	Pass	
302.4 Without Hearing	N/A	Has note
302.5 With Limited Hearing	N/A	Has note
302.6 Without Speech	Pass	
302.7 With Limited Manipulation	Pass	
302.8 With Limited Reach and Strength	Pass	
302.9 With Limited Language, Cognitive, and Learning Abilities	Pass	

Chapter 6: Support Documentation and Services

Criteria	Pass/Fail	Details
602.2 Accessibility and Compatibility Features	N/A	With note
602.3 Electronic Support Documentation	Fail	“See information in WCAG 2.x section.” 2.x section is which?
602.4 Alternate Formats for Non-Electronic Support Documentation	N/A	With note
603.2 Information on Accessibility and Compatibility Features	Pass	
603.3 Accommodation of Communication Needs	Pass	

Narrative Explanation

Limitations

This is a D-grade ACR, with all testing conducted by the vendor, using general product knowledge and VoiceOver, and applying to only half their product. In addition there’s a legal disclaimer of dubious legality, and no contact information. According to the vendor, this ACR passes:

- 31 of 31 WCAG A-level criteria
- 24 of 24 WCAG AA-level criteria
- 9 of 9 listed Section 508 Chapter 3 criteria
- 5 of 5 listed Section 508 Chapter 6 criteria

In total, information is missing for none of the WCAG criteria. Section 508 criteria have been included for Chapters 3 and 6, and a note is included from the vendor, explaining the absence of Chapter 5: “Menti does not have access to platform accessibility services and does not include components that have access to platform accessibility services, hence Chapter 5 Software has been removed from the report”.

Summary

According to the vendor, their end-user website passes every single WCAG 2.1 A-level and AA-level criteria. At the same time, the vendor [has a webpage](#) on their product’s sales site that lists extensive accessibility caveats and partial conformance (“Known accessibility limitations”). We think it best to go back and ask the vendor which list best reflects the reality of their product.

Additionally, as the vendor points out, this ACR only applies to the end-user website, and not the administrator website. This product allows administrators to create and administer

electronic polls which users can respond to on their laptops, desktops, or mobile devices. This ACR applies to the site or app that the poll-taker responds to, but there's no information available about the administrator's website.

So two things need to happen here:

One: especially in light of the confusion between this internally produced ACR and the "Known accessibility limitations page", UVM needs to go back to the vendor and ask them if they can provide an ACR performed by an external party, based on more than "general product knowledge".

Two, the vendor needs to provide an externally tested, rigorous ACR for the administrator's website.

At this point, OAS cannot provide guidance on this product and accessibility risk beyond what is listed here.