

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: Padlet

CRITERIA	PASS	FAIL	MORE DETAILS NEEDED
Version	X		Includes Section 508 criteria
Date	X		January 2025
Template	X		2.5INT
NDA	X		
Legal Disclaimer	X		
Product Information		X	No version information
Contact information		X	Generic support address
Evaluation Party	X		External testers used
Evaluation Method		X	Combination of automated, manual, and assistive technology testing used
Conformance Levels	X		
Notes	X		
WCAG Tables	X		
Completed Tables	X		
Section 508	X		
Not Applicable Remarks	X		
Level Documentation	X		
Conformance Matching	X		
TOTAL:	13	3	82%. This is a B-grade ACR.

WCAG 2.2 A Guideline Evaluations

GUIDELINE	PASS	FAIL	COMPLETE	DETAILS
1.1.1 Non-text content	Pass		Yes	
1.2.1 Audio-only and Video-only (Pre-recorded)	Pass		Yes	
1.2.2 Captions (Pre-recorded)	Pass		Yes	
1.2.3 Audio Description or Media Alternative (Pre-recorded)	Pass		Yes	

1.3.1 Info and Relationships	Pass		Yes	
1.3.2 Meaningful Sequence	Pass		Yes	
1.3.3 Sensory Characteristics	Pass		Yes	
1.4.1 Use of Color	Pass		Yes	
1.4.2 Audio control	Pass		Yes	
2.1.1 Keyboard		Fail	Yes	Ordering posts on a padlet is not possible with the keyboard
2.1.2 No Keyboard Trap	Pass		Yes	
2.1.4 Character Key Shortcuts	Pass		Yes	
2.2.1 Timing Adjustable	Pass		Yes	
2.2.2 Pause, Stop Hide	Pass		Yes	
2.3.1 Three Flashes or Below	Pass		Yes	Does Not Support, s/b Supports. Vendor is not responsible for user content, but we appreciate the depth of this note.
2.4.1 Bypass Blocks	Pass		Yes	
2.4.2 Page Titled	Pass		Yes	
2.4.3 Focus Order		Fail	Yes	Partially Supports.
2.4.4 Link Purpose (In Context)	Pass		Yes	
2.5.1 Pointer Gestures	Pass		Yes	
2.5.2 Pointer Cancellation	Pass		Yes	
2.5.3 Label in Name	Pass		Yes	
2.5.4 Motion Actuation	Pass		Yes	N/A with note
3.1.1 Language of Page	Pass		Yes	
3.2.1 On Focus	Pass		Yes	

3.2.2 On Input	Pass		Yes	
3.2.6 Consistent Help	Pass		Yes	
3.3.1 Error Identification	Pass		Yes	
3.3.2 Labels or Instructions	Pass		Yes	
3.3.7 Redundant Entry	Pass		Yes	
4.1.2 Name, Role, Value		Fail	Yes	Partially Supports

WCAG 2.2 AA Guideline Evaluations

GUIDELINE	PASS	FAIL	COMPLETE	DETAILS
1.2.4 Captions (Live)	Pass		Yes	N/A with note
1.2.5 Audio Description (Pre-recorded)		Fail	Yes	Does Not Support (vendor training videos)
1.3.4 Orientation	Pass		Yes	
1.3.5 Identify Input Purpose	Pass		Yes	
1.4.3 Contrast (Minimum)	Pass		Yes	
1.4.4 Resize Text	Pass		Yes	
1.4.5 Images of Text	Pass		Yes	
1.4.10 Reflow	Pass		Yes	
1.4.11 Non-Text Contrast	Pass		Yes	
1.4.12 Text Spacing	Pass		Yes	
1.4.13 Content on Hover Focus	Pass		Yes	
2.4.5 Multiple Ways	Pass		Yes	
2.4.6 Headings and Labels	Pass		Yes	
2.4.7 Focus Visible	Pass		Yes	

2.4.11 Focus Not Obscured (Minimum)	Pass		Yes	
2.5.7 Dragging Movements		Fail	Yes	Partially Supports
2.5.8 Target Size Minimum	Pass		Yes	
3.1.2 Language of Parts		Fail	Yes	Does Not Support. Users cannot mark resources as being in different languages
3.2.3 Consistent Navigation	Pass		Yes	
3.2.4 Consistent Identification	Pass		Yes	
3.3.3 Error Suggestion	Pass		Yes	
3.3.4 Error Prevention (Legal, Financial, Data)	Pass		Yes	
3.3.8 Accessible Authentication (Minimum)	Pass		Yes	
4.1.3 Status Messages		Fail	Yes	Partially Supports

Section 508

Chapter 3: Functional Performance Criteria

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

Chapter 5: Software

Criteria	Pass/Fail	Details
501.1 Incorporation of WCAG 2.0 AA	Pass	N/A with note
502. Interoperability with Assistive Technology	Pass	N/A with note
502.2.1 User Control of Accessibility Features	Pass	N/A with note
502.2.2 No Disruption of Accessibility Features	Pass	N/A with note
502.3.1 Object Information	Pass	N/A with note
502.3.2 Modification of Object Information	Pass	N/A with note
502.2.3 Row, Column, and Headers	Pass	N/A with note
502.3.4 Values	Pass	N/A with note
502.3.5 Modification of Values	Pass	N/A with note
502.3.6 Label Relationships	Pass	N/A with note
502.3.7 Hierarchical Relationships	Pass	N/A with note
502.3.8 Text	Pass	N/A with note
502.3.9 Modification of Text	Pass	N/A with note
502.3.10 List of Actions	Pass	N/A with note
502.3.11 Actions on Objects	Pass	N/A with note
502.3.12 Focus Cursor	Pass	N/A with note
502.3.13 Modification of Focus Cursor	Pass	N/A with note
502.3.14 Event Notification	Pass	N/A with note
502.4 Platform Accessibility Features	Pass	N/A with note
503.2 User Preferences	Pass	N/A with note
503.3 Alternative User Interfaces	Pass	N/A with note
503.4.1 Caption Controls	Pass	N/A with note
503.4.2 Audio Description Controls	Pass	N/A with note
504.2 Content Creation or Editing	Pass	N/A with note
504.2.1 Preservation of Information Provided for Accessibility in Format Converter	Fail	Partially Supports
504.2.2 PDF Export	Fail	Does Not Support. Accessibility information not preserved during .pdf export

504.3 Prompts	Fail	Does Not Support
504.4 Templates	Fail	Partially Supports

Chapter 6: Support Documentation and Services

Criteria	Pass/Fail	Details
602.2 Accessibility and Compatibility Features	Pass	
602.3 Electronic Support Documentation	Pass	N/A with note
602.4 Alternate Formats for Non-Electronic Support Documentation	Pass	
603.2 Information on Accessibility and Compatibility Features	Pass	
603.3 Accommodation of Communication Needs	Pass	

Narrative Explanation

Limitations

This is a B-grade ACR that ACR passes:

- 27 of 31 WCAG A-level criteria – 87%
- 20 of 24 WCAG AA-level criteria – 83%
- 2 of 9 listed Section 508 Chapter 3 criteria
- 24 of 28 listed Section 508 Chapter 5 criteria
- 5 of 5 listed Section 508 Chapter 6 criteria

In total, information is missing for none of the WCAG criteria or the Section 508 criteria.

Summary

This is a very strong ACR, well written and well executed, using external testers who employed automated, manual, and assistive technology testing. An EEAAP may be necessary to address the following WCAG criteria that are Partially Supported or Does Not Support:

- 2.1.1 Keyboard
- 2.4.3 Focus Order
- 4.1.2 Name, Role, Value
- 1.2.5 Audio Description (Pre-Recorded)
- 2.5.7 Dragging Movements

- 3.1.2 Language of Parts
- 4.1.3 Status Messages

At this time, Padlet is not being used in an instructional setting or for departmental work in an official capacity. If that were to change, OAS would work with the responsible department to generate an Equally Effective Alternate Access Plan (EEAAP).