

Accessibility Conformance Evaluation Report (ACE)

Phase 1: Document-Level Evaluation

Generated on June 29, 2026

Vendor declared: WCAG 2.2

Evaluator graded against: WCAG 2.1 A+AA + Section 508 Chapter 3 (Functional Performance) + Section 508 Chapter 5 (Software) + Section 508 Chapter 6 (Support Docs & Services)

Pass Rate by Standard

Standard	Criteria evidenced	Coverage
WCAG	50 / 50	100%
Section 508 Chapter 3 (Functional Performance)	9 / 9	100%
Section 508 Chapter 5 (Software)	26 / 26	100%
Section 508 Chapter 6 (Support Docs & Services)	5 / 5	100%

ICT Applicability

Based on declared ICT scope (**Application Software, Dynamic Web Applications**):

- 50 WCAG criteria apply to this ICT
- 40 Section 508 criteria apply (Chapter 3, Chapter 5, Chapter 6)
- Vendor addressed: **97 / 90** applicable criteria (108% disclosure rate)

Product Overview

PRODUCT NAME Oracle Health PowerChart Framework	PRODUCT VERSION 2024.3.01
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VENDOR / ORGANIZATION accessible_ww@oracle.com; Oracle Health Support phone: 1.866.221.8877; International TRS: +1.605.224.1837	REPORT DATE 2025-03-05
REPORT TITLE oracle-health-powerchart-framework-2024.3.01.pdf	
DESCRIPTION Oracle Health PowerChart Framework 2024.3.01 is a clinical application framework within the Oracle Health ecosystem, used to deliver core PowerChart functionality for healthcare providers. It underpins key workflows such as viewing and documenting patient information, ordering, and results review, and serves as a foundational UI framework on which other Oracle Health clinical modules are built.	
UPLOADED AS WCAG 2.2	EVALUATED AGAINST WCAG 2.1

Evaluation Summary

OVERALL EVALUATION RATING

Minimally Meets

This rating reflects the completeness, consistency, and credibility of the submitted accessibility documentation.

PASS RATE

50.0%

CONFORMANCE CLAIM CREDIBILITY

3/5 (Moderate)

Indicates how well-supported the accessibility claims are based on testing methodology, evidence, evaluator qualifications, and report quality.

Key Risk Summary

LEGAL RISK **MEDIUM**

The ACR acknowledges multiple Partially Supports and Does Not Support criteria and fails accuracy and evaluator-transparency checks, indicating unresolved WCAG 2.1 AA gaps. However, the presence of detailed remarks and some testing methodology reduces the likelihood of the report being viewed as intentionally misleading, placing legal exposure in a moderate range rather than high.

FUNCTIONAL RISK **HIGH**

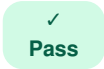
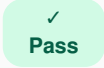
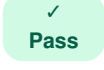
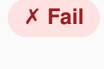
With fewer than half of criteria marked Supports, documented non-conformant areas, and unclear testing scope, there is a significant probability of real-world barriers for users with disabilities in critical clinical workflows. The combination of incomplete conformance and limited evidence of a remediation plan creates a high risk of functional accessibility issues impacting end users.

OPERATIONAL RISK **MEDIUM**

The ACR's structural completeness and clear contact channels support basic procurement and support processes, but weak tester credentials, lack of roadmap, and uncertain testing coverage may lead to additional evaluation cycles, custom testing, and contractual negotiations. This introduces moderate operational friction and potential delays, though not to the level of systemic disruption.

Summary Scorecard (4/9 Pass)

Summary Scorecard — 4/9 Pass

CRITERION	RESULT	NOTES
Report Format & Structure	 Pass	The ACR header explicitly states “VPAT® Version 2.5,” which is a current 2.x revision appropriate for a March 2025 report. The edition is clearly identified as “ACR Edition: WCAG 2.2” in the document metadata. The provided context shows standard ACR structural elements (product name, description, report date, notes, dependent products, evaluation methods) and proper use of the “VPAT®” mark, with no evidence of structural removal or improper customization. Based on the available excerpts, the ACR appears to follow the official ITI ACR 2.5 template without substantive alteration.
Report Recency	 Pass	The ACR includes a clearly labeled "Report Date: 05-Mar-2025" / "Report Date: 2025-03-05" in the metadata and header, which is well within the 12–24 month recency window for evaluation. The report explicitly covers the current product version Oracle Health PowerChart Framework 2024.3.01, indicating the evaluation aligns with the actively maintained version. No evidence suggests the report is tied to an older product version or that the date is ambiguous or missing.
Criteria Coverage	 Pass	The ACR includes 97 total rows, with a status assigned to each (Supports, Partially Supports, Does Not Support, or Not Applicable), indicating no blank or unrated criteria. The rules engine reports 90 expected criteria and confirms that all 90 are covered, with 0 missing and 100% coverage, so no WCAG 2.1 A/AA or Section 508 criteria appear to be omitted. The high proportion of Not Applicable entries (49 of 97) may warrant closer scrutiny of individual justifications, but this does not indicate missing criteria. Given full coverage and no reported omissions, the ACR meets the completeness requirement for WCAG 2.1 AA and Section 508 tables.
Conformance Accuracy	 Fail	The ACR shows multiple misapplied conformance levels and misunderstandings of WCAG, undermining the accuracy of its claims. Several criteria are incorrectly marked Not Applicable where they clearly apply to a web product (e.g., 1.3.5 and 4.1.1 are labeled N/A despite using HTML/ARIA/XML, and 1.4.12 is marked N/A based on a misinterpretation of text spacing requirements). Other rows use “Supports” where the remarks or related criteria indicate gaps, such as 2.4.3 marked Supports despite documented keyboard navigation issues under 2.1.1, and 2.4.1/2.4.5 claiming guidelines are “automatically met” without describing actual mechanisms. These patterns indicate inflated or poorly justified ratings and inconsistent use of “Supports,” “Partially Supports,” and “Not Applicable,” making the ACR’s conformance assertions unreliable for procurement decisions.

CRITERION	RESULT	NOTES
Remark Quality		<p>The ACR provides substantive, criterion-specific remarks for all sampled conformance levels, including detailed descriptions of failures and their locations for “Does Not Support” and “Partially Supports” entries (e.g., specific toolbar dragging behavior for 2.5.7, lack of zoom/reflow for 1.4.10, and identified low-contrast elements for 1.4.3 and 1.4.11). “Supports” rows include tailored explanations of how requirements are met, such as describing logical reading order and label associations for 1.1.1, 1.3.1, and 1.3.2. “Not Applicable” entries use brief but appropriate product-specific justifications (e.g., repeated but relevant statements that the product has no multimedia for 1.2.x). While some N/A remarks are repetitive, the overall pattern shows clear, relevant, and mostly original remarks that align with conformance levels and acknowledge known issues, satisfying the pass criteria.</p>
Testing Methodology	—	<p>The ACR’s “Evaluation Methods Used” section explicitly states that Oracle employs a mix of “algorithmic automated tests,” “human judgement tests such as tool-assisted tests, visual inspection and manual operation,” and [unverified quote redacted] which demonstrates both automated and manual/AT-based testing. This shows awareness that automation alone is insufficient and that manual interaction and AT use are part of the methodology. While the individual WCAG remarks shown are brief and somewhat templated, they do reference behavior as experienced by assistive technologies (e.g., sequence of elements presented by assistive technologies), indicating at least some manual/AT-informed insight. The Tester Disclosure Form lacks detail, but the methodology statement in the ACR itself is clear and sufficient to meet this criterion.</p>
Assistive Technology Coverage	—	<p>The ACR’s methodology section states that Oracle’s recommended testing styles include [unverified quote redacted] but it does not name any specific assistive technologies or platforms (e.g., NVDA, JAWS, VoiceOver, TalkBack, magnifiers, or speech input tools). The Tester Disclosure Form further lists “Assistive Technologies: None,” indicating no concrete ATs were documented for this specific evaluation. While some WCAG remarks reference behavior “presented by assistive technologies,” they do not identify which tools were actually used. Because the report lacks explicit, tool-level AT details and shows a contradiction between generic AT claims and the disclosure data, this criterion is not met.</p>
Evaluator Credentials		<p>The ACR does not identify any individual evaluator, list any accessibility-related certifications, or describe specific accessibility training or years of experience. The only information provided is a generic accessibility contact email and a high-level description of evaluation methods, with no named personnel or credentials. The Tester Disclosure Form likewise contains no evaluator name, role, certifications, experience, or supporting materials. This aligns with the Fail criteria, which include use of a generic team identity and lack of disclosed accessibility-specific qualifications or substantiating documentation.</p>
Accessibility Roadmap		<p>The ACR includes at least some non-fully-conformant criteria (“Partially Supports” or “Does Not Support”), as indicated by validation errors and less-than-perfect consistency, but there is no detected mention of a remediation plan, roadmap, or future remediation activities. The keyword search across the ACR for terms like “remediation plan,” “planned remediation,” or “future updates” returned no matches, and no alternative evidence of a forward-looking accessibility plan is provided in the supplied context. Because known or likely issues are not paired with any stated remediation path, responsible parties, timelines, or commitment to follow-up testing or updated ACRs, this criterion is not met.</p>

Detailed Evaluation Domains

Domain 1 ACR Version and Report Details

STRENGTHS

- Uses a current VPAT-based ACR template (ACR Version 2.5) appropriate for WCAG 2.x reporting.
- Clearly identifies the product name and version as “Oracle Health PowerChart Framework 2024.3.01.”
- Includes a recent report date (2025-03-05), supporting temporal relevance of the findings.
- Provides clear accessibility contact information in the header for follow-up questions.

WEAKNESSES

- None of the Phase-1 checks indicate substantive weaknesses in basic report metadata or versioning.

REVIEWER NOTES

The ACR is structurally sound and up to date, with clear product identification, template version, and contact details. From a procurement perspective, the foundational report details are reliable and align with expectations for a WCAG 2.1 AA–relevant ACR, even though the template is labeled for WCAG 2.2.

Domain 2 Claimed Accessibility Conformance Summary

STRENGTHS

- The ACR assigns a conformance status to every criterion, avoiding gaps in the summary table.
- The distribution of Supports / Partially Supports / Does Not Support suggests at least some willingness to acknowledge non-conformance.
- The ACR avoids prohibited or concerning statements that would undermine the credibility of the conformance summary.

WEAKNESSES

- Overall conformance level is not credibly established: only about 38% of criteria are marked Supports, with a non-trivial number of Partially Supports and Does Not Support ratings, yet no clear, conservative overall claim is articulated.
- Misapplied conformance levels and misunderstandings of WCAG undermine the reliability of the claimed conformance summary.
- Lack of evaluator identity and testing transparency makes it difficult to trust the implied conformance posture at face value.

REVIEWER NOTES

The conformance summary is internally inconsistent with WCAG expectations: the mix of Supports, Partially Supports, and Does Not Support ratings does not support a strong overall WCAG 2.1 AA claim. Buyers should treat the ACR as an initial indicator of issues rather than a definitive statement of conformance.

Domain 3 Conformance Level Assertions

STRENGTHS

- Every WCAG 2.1 AA criterion in scope is assigned a status (Supports, Partially Supports, Does Not Support, or Not Applicable).
- The ACR uses both “Partially Supports” and “Does Not Support,” which is preferable to overusing Supports and indicates some willingness to acknowledge barriers.
- Remarks for non-fully-conformant criteria generally include concrete examples that help interpret the chosen status.

WEAKNESSES

- The ACR fails the accuracy check for conformance claims, with multiple misapplied levels and apparent misunderstandings of WCAG success criteria.
- The overall pattern of ratings (low Supports percentage, presence of Does Not Support) is not reconciled with any explicit, conservative overall conformance assertion.
- Lack of independent evaluator information and missing testing detail further erode confidence that the assigned levels accurately reflect real-world accessibility.

REVIEWER NOTES

Conformance level assertions are present but not fully trustworthy. The use of Partially Supports and Does Not Support is structurally correct, yet the underlying accuracy issues mean that procurement teams should corroborate these assertions with independent testing or additional vendor evidence before relying on them for WCAG 2.1 AA risk decisions.

Domain 4 Coverage of Accessibility Criteria (Section 508/WCAG)

STRENGTHS

- The ACR fully enumerates the WCAG 2.1 AA criteria (and additional WCAG 2.2 rows) with 97 total entries, each assigned a status.
- All criteria marked Not Applicable include justifications in the remarks, and none appear to be used as a blanket exclusion for clearly applicable functionality.
- The ACR uses a WCAG-based edition appropriate for assessing WCAG 2.1 AA coverage, and does not omit any required criteria at that level.

WEAKNESSES

- While coverage is complete on paper, the accuracy issues in conformance levels introduce uncertainty about how well the reported coverage reflects actual product behavior.
- Testing scope and environment details are weak, so it is unclear whether all major user flows and platforms relevant to WCAG 2.1 AA were meaningfully exercised.

REVIEWER NOTES

On a checklist basis, the ACR covers all WCAG 2.1 AA criteria and provides statuses and remarks for each, which is a strong structural indicator. However, gaps in testing scope documentation and conformance accuracy mean that coverage should be interpreted as nominal rather than fully validated.

Domain 5 Quality and Clarity of Remarks & Explanations

STRENGTHS

- Remarks are consistently present and substantive for sampled criteria, including Supports, Partially Supports, Does Not Support, and Not Applicable.
- Explanations for partially supporting criteria provide concrete, feature-level examples that specify where and how barriers occur.
- Terminology and issue descriptions generally align with WCAG concepts, and the language is neutral, technical, and audit-grade in detail.
- The ACR avoids marketing language and focuses on specific behaviors, which improves interpretability for accessibility professionals.

WEAKNESSES

- Despite strong detail, some remarks appear to be paired with misapplied conformance levels, indicating a disconnect between narrative findings and the chosen status.
- The ACR does not clearly distinguish between issues that are configuration-dependent versus inherent product limitations, which can complicate remediation planning.

REVIEWER NOTES

The narrative quality of the ACR is a relative strength: remarks are detailed, criterion-specific, and largely aligned with WCAG terminology. The main concern is not clarity but calibration—some well-described issues are not matched with appropriately conservative conformance ratings.

Domain 6 Tester Credentials

STRENGTHS

- None of the Phase-1 checks identify any positive evidence of individual evaluator qualifications, which at least avoids overstated or misleading credential claims.
- The ACR does describe general testing methods, implying that some internal accessibility process exists within Oracle.

WEAKNESSES

- No evaluator name, role, or organization is provided, preventing any assessment of independence or expertise.
- No résumé, certifications, or training details are supplied for the primary evaluator, failing multiple tester-credential criteria.
- There is no description of the evaluator's relevant accessibility experience, making it impossible to gauge the depth of WCAG 2.1 AA knowledge applied.
- Overall evaluator transparency is poor, with only a generic accessibility contact and corporate branding in place of individual accountability.

REVIEWER NOTES

Tester credential transparency is a significant weakness. The absence of named evaluators, qualifications, or experience details reduces confidence in the rigor and objectivity of the ACR, especially given the identified inaccuracies in conformance claims.

Domain 7 Vendor Accessibility Commitment and Accountability

STRENGTHS

- The ACR provides a dedicated accessibility contact channel, indicating at least a basic organizational structure for handling accessibility inquiries.
- The report acknowledges non-fully-conformant criteria (Partially Supports and Does Not Support), which is a prerequisite for meaningful remediation planning.
- General Oracle Health support contact information and TRS details suggest some awareness of communication accessibility obligations.

WEAKNESSES

- No accessibility roadmap or remediation plan is referenced, despite the presence of known non-conformant criteria.
- There is no discussion of Oracle's past accessibility track record, prior ACRs, or public accessibility statements for this product line.
- The ACR does not address availability or transparency of the report itself (e.g., public posting, update cadence), limiting accountability.
- Third-party involvement is not disclosed, and there is no acknowledgment of independent testing rights, which weakens trust from buyers seeking external validation.

REVIEWER NOTES

Vendor commitment appears procedural rather than strategic: contact channels exist and issues are acknowledged, but there is no visible roadmap, history, or explicit accountability framework. For a product with multiple non-conformant criteria, the lack of a remediation narrative is a notable concern for long-term accessibility outcomes.

Domain 8 Vendor Testing Practices and Methodology

STRENGTHS

- The ACR documents evaluation methods, including algorithmic automated tests, human judgment, and assistive technology-based testing.
- The methodology explicitly notes a balance of automated and manual testing, which is aligned with best practices for WCAG 2.1 AA evaluation.
- The report acknowledges that certain components (e.g., shared components, configuration/admin tools) are out of scope, which is better than silently omitting them.

WEAKNESSES

- Testing scope and environment are insufficiently documented; key details such as specific platforms, browsers, and assistive technologies are missing or only vaguely referenced.
- There is no clear description of coverage across major user flows, roles, or high-risk tasks, making it hard to judge whether testing was representative.
- Platform and browser coverage is not specified, leaving uncertainty about cross-environment accessibility behavior.
- No testing artifacts or evidence (e.g., defect logs, test cases) are referenced, so claims cannot be independently corroborated.
- The lack of evaluator attribution and independence further undermines confidence in the described methodology, even where it aligns with best practices in theory.

REVIEWER NOTES

The ACR describes a generally appropriate mix of testing techniques but lacks the specificity needed to assess real coverage and rigor. Without clear scope, environment, and assistive technology details, the methodology reads as a generic process statement rather than a concrete test plan for this specific product version.

Conformance Claim Credibility Breakdown

Credibility Score: 3/5

Report Recency	✓
Testing Methodology Documented	✓
Independent Evaluation	✗
Evidence Provided	✗
Remarks Quality	✓

Guidance & Recommended Next Steps

1. Request a supplemental accessibility briefing from Oracle that identifies the named evaluators, their qualifications, and clarifies how conformance levels were determined for key WCAG 2.1 AA criteria, especially those marked Supports despite complex remarks.
2. Ask Oracle to provide a concrete accessibility remediation roadmap for all Partially Supports and Does Not Support criteria, including target timelines, prioritization (e.g., critical clinical workflows first), and planned release vehicles.
3. Require additional testing evidence focused on high-risk user journeys (e.g., core clinical documentation, order entry, results review) across supported platforms and assistive technologies, and compare findings against the ACR's existing conformance claims.
4. Incorporate accessibility-specific acceptance criteria into procurement or contract language (e.g., minimum WCAG 2.1 AA coverage, remediation SLAs, and independent testing rights) to compensate for current gaps in vendor accountability and transparency.
5. Conduct or commission an independent accessibility evaluation of Oracle Health PowerChart Framework, using the ACR as an input but not a sole source of truth, to validate critical criteria and inform risk mitigation plans.
6. Request that future ACR updates explicitly align to WCAG 2.1 AA, clarify any WCAG 2.2-only criteria as informational, and improve documentation of testing scope, platforms, browsers, and assistive technologies used.
7. Prioritize internal contingency planning (e.g., alternative workflows, reasonable accommodations, and training) for user groups most likely to encounter barriers, based on the non-conformant areas identified in the ACR and any supplemental testing.

Important Notes and Limitations

- This report evaluates accessibility documentation only (Phase 1).
- It does not test the product directly.
- It does not certify accessibility compliance.
- Additional validation (e.g., testing) may be required for high-risk use cases.

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Generated by **ReveloACE** (Accessibility Conformance Evaluator)

Confidence Score: 89%

Report ID: 6a22539160cc154455005be5

Date: June 29, 2026