

FEDERAL PROCUREMENT DECISION GUIDE · 5 STEPS

# Do You Need a VPAT?

A five-step decision guide for vendors selling, planning to sell, or hoping to sell to federal agencies. Find out whether you need a VPAT, what edition to produce, and what happens if you walk into a federal procurement without one.

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**TIME TO COMPLETE**

5 minutes

**AUDIENCE**

Vendors & Sales Teams

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# VPAT and ACR in plain English

Most vendors hear about VPATs for the first time when a federal customer asks for one. By then, it is already late.

A **VPAT** is the Voluntary Product Accessibility Template, maintained by the Information Technology Industry Council (ITI). The current version is **VPAT 2.5Rev** as of April 2025. It is a structured template that documents how a product conforms to a specific accessibility standard.

A **VPAT** is the blank template. An **ACR**, or Accessibility Conformance Report, is what you get when the VPAT has been completed for a specific product. The two terms are often used interchangeably in casual conversation, but in procurement language the agency wants the ACR (the completed document), not the blank template.

VPAT 2.5 comes in four editions:

- **VPAT 2.5 508:** Maps to the Revised Section 508 standards, the U.S. federal accessibility law.
- **VPAT 2.5 WCAG:** Maps to the Web Content Accessibility Guidelines (WCAG 2.0, 2.1, and 2.2).
- **VPAT 2.5 EU:** Maps to EN 301 549, the European Union's accessibility standard for ICT procurement.
- **VPAT 2.5 INT:** Combines all three of the above for vendors selling internationally.

For federal procurement in the United States, the relevant edition is the VPAT 2.5 508 (or the INT edition if you also sell to international government customers). This guide focuses on the federal use case.

## 01 Are You Selling Information or Communication Technology?

STEP 1

Section 508 covers Electronic and Information Technology (EIT), expanded under the Revised standards to Information and Communication Technology (ICT). This is broad: it covers websites, web applications, mobile apps, software, hardware, electronic documents, multimedia, and most of what gets procured by a federal IT department.

YES  NO Your product is software, a web application, a mobile app, hardware with a user interface, an electronic document, a website, or a service that produces any of the above.

**IF YES:** Continue to Step 2. Your product is in scope.

## 02 Are You Selling to a Federal Agency?

STEP 2

Section 508 binds federal agencies, not private vendors. But it reaches every vendor who sells to one. Federal contracting officers are required to consider accessibility in procurement decisions, and they do that by requesting an ACR.

YES  NO Your organization sells, plans to sell, or hopes to sell to a federal executive branch agency, military department, or independent regulatory agency.

**IF YES:** Continue to Step 3. You will be asked for a VPAT, almost certainly, on any contract that involves your product.

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YES  NO Your organization is a subcontractor to a prime that sells to a federal agency.

**IF YES:** Continue to Step 3. The prime is responsible for VPAT compliance to the federal customer, and they will flow that obligation down to you in the subcontract.

## 03 Has the Customer Asked for a VPAT or ACR Yet?

STEP 3

The trigger for needing a VPAT is usually a procurement request: a contracting officer or a buyer asks for one before they will issue an order or evaluate your bid. That is the obvious trigger. There are also less obvious triggers.

YES NO

A federal customer has explicitly requested a VPAT, an ACR, or "your accessibility documentation."

**IF YES:** *You need one now. Continue to Step 4 to figure out the edition and the scope.*

YES NO

You are responding to an RFP that mentions Section 508, accessibility, ICT accessibility, WCAG, or EIT (any of those keywords).

**IF YES:** *The RFP probably requires a current ACR with the proposal. Failing to provide one is usually scored as noncompliance and can disqualify the bid.*

YES NO

You are listed on a GSA schedule, a SEWP contract, or any other federal procurement vehicle.

**IF YES:** *Federal buyers using these vehicles routinely request ACRs as part of their order process. You should have one ready before the next order, not after.*

### 4.1 The right edition

For U.S. federal procurement, use the **VPAT 2.5 508** edition. If you also sell to European public sector or international customers, use the **VPAT 2.5 INT** edition, which covers all three frameworks in a single document.

### 4.2 The right scope

An ACR covers a specific product, at a specific version, at a specific date. Three things to confirm before you start:

- **Which product?** If your company sells five products, you need five ACRs, not one. The ACR identifies the product by name and version.
- **Which version?** ACRs go stale. A new major release usually requires a new ACR. Most federal customers expect the ACR to reflect the version they are about to procure.
- **Which features?** If your product has modules or features that the customer is not procuring, the ACR can scope to what they are getting. Be explicit about what is in scope.

### 4.3 The right tester

ACRs that are filled out by the development team without independent testing are weak. Federal procurement reviewers can usually tell the difference. The right pattern is to have the manual testing performed by someone who is qualified, who is independent of the development team, and who uses both automated and manual techniques.

The consequences depend on the procurement context. The four most common outcomes:

### 5.1 You lose the bid

The most common outcome for competitive procurements where the RFP requires an ACR. The contracting officer scores you as noncompliant on the accessibility criterion. Even if your product is excellent, the absence of the document is treated as a material gap.

### 5.2 You get a 30-day grace period and have to scramble

On smaller procurements, the buyer sometimes lets you provide the ACR after the order. This is fine if you can produce a good one in 30 days. It is not fine if you have never built one and have to start from scratch with a real product to test.

### 5.3 You provide a weak one and the customer comes back with questions

Vendors who fill out a VPAT in 90 minutes by checking "Supports" on every row almost always get questioned. The customer then asks for evidence, and the vendor has to produce manual test results that do not exist.

### 5.4 You sign the contract, then fail an audit

The slowest and most expensive outcome. A weak ACR holds up at procurement, the contract is awarded, and an audit or complaint surfaces the gap. Now you are remediating under contract pressure with the customer's lawyers involved.

## Get Ahead of the Question

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The vendors who win on accessibility are the ones who have a current, defensible, manually-tested ACR ready before the federal customer asks. The vendors who lose are the ones who scramble at procurement time. The difference is usually 30 to 60 days of preparation that nobody on the sales team thought was urgent until it was too late.

### Schedule a Free Accessibility Scan

We will run a manual accessibility scan of your product's primary interface at no cost and give you a short report with the real findings. If your product is in good shape, you will know it and can move forward with confidence. If it is not, you will know exactly what would have come back from a federal customer's audit, and you will have time to fix it before the bid is on the line.

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