

PROCUREMENT QUALITY CHECK · 10 QUESTIONS

# VPAT Quality Check: How to Spot a Bad Vendor VPAT

Ten questions that any procurement officer or contracting officer can use to evaluate a vendor's Accessibility Conformance Report. No accessibility expertise required. Each question explains what a strong answer looks like and what a weak one signals.

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**TIME TO COMPLETE**

10 minutes per VPAT

**AUDIENCE**

Procurement, COs, COTRs

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## Why this checklist exists

Most vendor VPATs are weak in predictable ways. Procurement officers do not need accessibility credentials to spot the patterns. They need a list.

Federal procurement now routinely requires an Accessibility Conformance Report (ACR) from vendors selling Information and Communication Technology to federal agencies. The ACR is a completed Voluntary Product Accessibility Template (VPAT), maintained by the Information Technology Industry Council (ITI). The current version is VPAT 2.5Rev (April 2025).

The honest truth about vendor ACRs is that quality varies wildly. A well-prepared ACR is a defensible, manually tested, specific document that an auditor can rely on. A poorly prepared ACR is a 30-minute box-checking exercise by someone on the vendor's marketing team who has never used a screen reader.

Procurement officers do not need to be accessibility experts to spot the difference. They need to know what to look at. This checklist gives them that.

### HOW TO USE THIS CHECKLIST

Sit with the vendor's ACR open in front of you. Walk through the ten questions below. For each one, mark the answer as STRONG, WEAK, or MISSING. Three or more weak or missing answers is a signal that the ACR was not prepared seriously and you should push back before accepting it as part of the procurement record.

# 01 Document Quality Questions

5 QUESTIONS

**STRONG**  **WEAK** **1.1 Is the VPAT version current?**  
**STRONG:** The document identifies itself as VPAT 2.5 (or 2.5Rev) and the appropriate edition (508, INT, etc.). **WEAK:** The document is on VPAT 2.0, 2.1, 2.2, or 2.3, all of which predate the current standards. **MISSING:** No version is identified at all. Vendors who submit old VPAT versions are usually relying on documentation they did once and have not updated since.

**STRONG**  **WEAK** **1.2 Is the product and version specifically named?**  
**STRONG:** The ACR identifies the product by name and the specific version evaluated, with the date of the evaluation. **WEAK:** The product is named but the version is "all versions" or "latest" or unstated. **MISSING:** The product is identified only generically. ACRs that are not version-specific are rarely current.

**STRONG**  **WEAK** **1.3 Is the date of the evaluation recent?**  
**STRONG:** The evaluation date is within the last 12 months. **WEAK:** The evaluation date is more than 18 months old. **MISSING:** No date is provided. ACRs more than 18 months old usually do not reflect the current product, especially for software that ships frequent releases.

**STRONG**  **WEAK** **1.4 Is the evaluation methodology disclosed?**  
**STRONG:** The ACR identifies the testing methodology used: automated tools, manual testing, screen reader testing, keyboard testing, who performed the testing, and whether the testers were independent of the development team. **WEAK:** The methodology is "internal review" or "self-assessment" with no further detail. **MISSING:** No methodology is identified at all. Without disclosed methodology, the conformance claims have no foundation you can evaluate.

**STRONG**  **WEAK** **1.5 Is the evaluator named and qualified?**  
**STRONG:** The evaluator is named (individual or organization) and has accessibility credentials or known expertise. **WEAK:** The evaluator is "the product team" or anonymous. **MISSING:** No evaluator is named. Anonymous evaluations by the same team that built the product are the most common pattern and the weakest.

## 02 Conformance Claim Questions

5 QUESTIONS

**STRONG**  **WEAK**

### 2.1 Are the Remarks and Explanations columns actually filled in?

**STRONG:** Each row has a substantive remark explaining how the product meets (or fails to meet) the criterion, with specific references to features or behaviors. **WEAK:** The remarks are blank, repeat the conformance status, or use boilerplate ("This product supports this criterion through standard implementation"). **MISSING:** The Remarks column is empty across the document. Empty remarks are the single biggest tell that the VPAT was filled in by someone going through the motions.

**STRONG**  **WEAK**

### 2.2 Does the document acknowledge any "Partially Supports" or "Does Not Support" rows?

**STRONG:** The ACR honestly identifies criteria where the product partially supports or does not support the standard, with explanations and roadmap notes. **WEAK:** Every single row is "Supports" with no exceptions. No real product passes every WCAG criterion. A VPAT that claims 100 percent conformance is almost certainly inaccurate.

**STRONG**  **WEAK**

### 2.3 Are screen reader and assistive technology compatibility specifics disclosed?

**STRONG:** The ACR identifies the assistive technologies tested (JAWS, NVDA, VoiceOver, etc.) and the version of each. **WEAK:** The ACR claims compatibility with assistive technology generically. **MISSING:** No assistive technology is mentioned. If the vendor cannot tell you which screen readers they tested with, they probably did not test with screen readers.

**STRONG**  **WEAK**

### 2.4 Is the scope of the product clearly defined?

**STRONG:** The ACR identifies which modules, features, or surfaces of the product are covered and which are explicitly out of scope. **WEAK:** The ACR claims to cover "the entire product" with no detail on what that includes. **MISSING:** No scope is defined. Scope-vague ACRs are how vendors avoid documenting the parts of their product where conformance is poor.

**STRONG**  **WEAK**

### 2.5 Does the document include a remediation roadmap for "Partially Supports" or "Does Not Support" criteria?

**STRONG:** Where the product does not fully conform, the ACR or an accompanying document identifies the planned remediation, the responsible team, and a target date. **WEAK:** Failures are acknowledged but no remediation is committed. **MISSING:** No remediation is mentioned and no failures are acknowledged. Strong vendors are honest about gaps and transparent about plans to close them.

## How to Push Back

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### If 0 to 2 questions are weak or missing

The ACR is in good shape. Accept it for the procurement record and move on. Note any specific weaknesses in your file in case the issue comes up in a future audit.

### If 3 to 5 questions are weak or missing

Push back. Send the vendor a request for clarification on the specific weak items. Most vendors will provide better documentation when asked, and the ones who do not are signaling that the gap is real. Strong vendors take the request as a chance to demonstrate competence; weak vendors get defensive.

### If 6 or more questions are weak or missing

The ACR is not a defensible document. Do not accept it as evidence of accessibility conformance. Options include: requiring the vendor to provide a current, manually tested ACR before the procurement proceeds; requiring an independent third-party accessibility evaluation; or scoring the vendor as noncompliant on the accessibility criterion.

#### A NOTE FOR PROCUREMENT OFFICERS

Federal procurement officers have the authority to require strong accessibility documentation from vendors. The most common reason this does not happen is that the procurement team does not feel confident pushing back on technical-sounding language. This checklist exists to give you that confidence. The questions above are the right questions to ask, regardless of your background in accessibility. If a vendor cannot answer them, the issue is the vendor, not your understanding.

## When the VPAT Does Not Hold Up

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Sometimes the right answer is not to accept the vendor's VPAT, even after pushback. In those cases, federal procurement officers can require an independent third-party accessibility evaluation as a condition of the contract. We perform those evaluations for federal agencies and prime contractors who need a defensible answer when a vendor's documentation does not provide one.

### Schedule a Free Accessibility Scan

If you have a vendor product you need to evaluate independently, we can help. We will run a free manual accessibility scan of the vendor's primary interface so you can see what their VPAT does or does not reflect. No vendor pitch. Just the evidence you need to make the procurement decision.

· [hello@simkinselgazar.com](mailto:hello@simkinselgazar.com)

[SCHEDULE YOUR FREE SCAN →](#)