



Quick Guide: Reviewing an Accessibility Conformance Report

An Accessibility Conformance Report (ACR), created using a Voluntary Product Accessibility Template (VPAT), describes how a vendor's product meets accessibility standards such as WCAG 2.1, Level AA.

ACRs are vendor-reported documents, so they should be carefully reviewed during procurement to identify potential accessibility gaps.

Step 1: Confirm the Basic Information

Start by reviewing the header information in the ACR.

Check for:

- Product name and version
- Date of the report
- Vendor contact information
- Accessibility standard referenced (should list WCAG 2.1 Level AA)

Red flag:

- If the report is several years old, it may not reflect the current product.

Step 2: Review Conformance Claims

Each accessibility criterion will typically be marked as:

- Supports
- Partially Supports
- Does Not Support
- Not Applicable

Focus your attention on:

- Partially Supports
- Does Not Support

These indicate potential accessibility barriers.

Step 3: Read the Remarks and Explanations

The Remarks and Explanations column is often the most important part of the ACR.

Look for:

- Clear descriptions of accessibility behavior

- Identified limitations
- Information about workarounds
- References to testing or assistive technologies

Red flag:

- Vague responses such as “Supports with exceptions” or “Planned for future release” without explanation.

Step 4: Look for Evidence of Accessibility Testing

Strong ACRs often describe how the product was tested.

Look for references to:

- Screen readers (such as NVDA or JAWS)
- Keyboard navigation
- Automated testing tools
- Manual accessibility testing

Red flag:

- If the report does not mention any testing methods.

Step 5: Identify Accessibility Gaps

Accessibility gaps are common. What matters is how the vendor addresses them.

Check whether the vendor provides:

- A remediation roadmap
- Planned fixes or timelines
- Documentation describing known issues

Procurement teams may want to require remediation commitments in the contract.

Step 6: Ask Follow-Up Questions if Needed

If accessibility information is unclear, agencies can request clarification from vendors.

Examples:

- How was accessibility tested?
- What assistive technologies were used during testing?
- Are there plans to address identified accessibility gaps?

Rubric: Evaluate accessibility narrative questions

Describe how the organization meets the defined requirement for accessibility.

- 0 **Non-responsive.** Response does not provide information, does not address the question, or there was no response.
- 1 **Poor response.** Information indicates limited to no awareness of the accessibility requirements, provides little or no data, or has limited data on their ability to support the requirements.
- Clearly lacks significant accessible functionality.
 - Provides little to no specifics on how the design phase influences development.
 - Relies on third-party technology, such as an AI-powered tool or listing automated tools used to test solutions, with limited information about how the responder leverages the testing to improve their technology.
 - Low-quality statements such as “Our technology complies with all applicable laws and regulations” or “Our QA team validates accessibility as part of their process.”
 - Provides limited data on tools, staff skills, training, or qualifications.
 - Does not support technical and functional evaluation with keyboards and other assistive technology.
- 5 **Average/Satisfactory:** The responder’s information indicates knowledge of how the solution supports each criterion, and there is sufficient data to negotiate future improvements.
- Information provides some data on how the organization’s operations create or deliver solutions that are more likely to support the accessibility requirements.
 - There may be just enough data to be assured of accessibility or to be confident in the responder’s ability to improve the solution’s accessibility.
 - Provides some data on capacity to create and deliver accessible solutions, and some confidence that accessibility is included in personnel management and operations.
 - Supports some technical and functional evaluation with keyboards and other assistive technology.
 - Examples include:
 - Listing tools used
 - Identifying the number of certified or knowledgeable employees
 - References to general practices with somewhat concrete examples
 - Creation of an ACR/completed VPAT
- 10 **Exceptional:** The responder demonstrates extensive knowledge of accessibility and illustrates how their processes result in a solution that supports most or all accessibility criteria.

- Where the solution does not support criteria, the responder provides a documented roadmap toward future compliance.
 - Examples include incorporating accessibility into the design process, outlining manual and automated testing procedures, and/or how fixes are built into the development lifecycle.
- Demonstrates extensive staff knowledge of accessibility and illustrates in detail how they build accessibility into the entire life cycle, from beginning to end.
 - Examples include identifying specific hiring practices and/or internal training programs, data on staff and their knowledge levels, and detail on how accessibility practices are deployed in the software development lifecycle.
- Demonstrates how the solution supports most or all accessibility criteria.
- Supports most or all technical and functional evaluation with keyboards and other assistive technology.
- Examples include:
 - Listing tools used
 - Identifying the number of certified employees
 - References to general practices with somewhat concrete examples
 - Creation of a completed VPAT/ACR

Considerations for Evaluators

Assess risk based on impact, not just a checklist. The more users impacted, the higher the compliance risk.

- Is it based on the correct Vendor Product Accessibility template (VPAT)/ACR?
- Does it reflect the same product version you're procuring?
- Is the ACR older than 12 months?
- What organization conducted the audit?
- What type of testing did they use?
- Are the answers varied or just box-checking?

Red Flags

Red flags are not necessarily used to disqualify a vendor, but rather to open the dialog for additional information to determine if the vendor is able to be compliant:

- Having a VPAT/ACR does not mean the product is accessible.
- All boxes are marked the same. Many VPAT/ACRs include a mix of Supports, Partially Supports, Does Not Support, and Not Applicable. This is an indication of honesty and transparency.
- Not Evaluated may be a red flag. Ask for details.
- VPAT/ACR is older than 12 months or based on a previous template.
- Auditing and testing were conducted by the vendor. Unless they have an accessibility expert on staff, the results may not be accurate or complete or contain biased information.
- Only using manual or automated testing. Testing should be both.

Free Guides for Reviewing VPAT/ACRs

VPAT Overview and Template:

Information Technology Industry Council: <https://www.itic.org/policy/accessibility/vpat>

Accessible Technology Procurement Toolkit:

U.S. General Services Administration: <https://www.section508.gov/buy/>

How to Evaluate a VPAT:

Buy Accessible Initiative: <https://www.buyaccessible.gov/tools-resources/>

VPAT Review Guide:

University of Minnesota Accessible U: <https://accessibility.umn.edu/what-vpat>

Key Reminder

An ACR is a starting point, not proof of compliance.

It helps agencies understand accessibility claims, identify risks, and ask informed questions during procurement.