

VPATs and Accessibility (October 14, 2025)

- **Panelists:** Jason Heron (moderator), Brennan Maupin, Emily Hilgendorf, Kristine Neuber, Korey Singleton
- **Topic:** Understanding and using VPATs (Voluntary Product Accessibility Templates) in procurement and accessibility review processes at Virginia higher education institutions.

VPAT Basics

- VPAT (Voluntary Product Accessibility Template): Tool developed by the Information Technology Industry Council (ITI) used to document a product's accessibility compliance.
- ACR (Accessibility Conformance Report): A completed VPAT.
- WCAG (Web Content Accessibility Guidelines): Standards from the W3C that define digital accessibility requirements (e.g., color contrast, focus indicators, captions).

Evaluating VPAT Quality

High-quality VPATs:

- Provide specific remarks and testing methods.
- Are often prepared by third-party auditors (more reliable than in-house ones).
- Clearly explain what “partially supports” or “does not support” means.

Poor VPATs:

- List “supports” for every criterion with no details.
- Lack transparency or require NDAs to access—red flags for accessibility.

Using VPATs in Procurement

- VPATs are step one in evaluating a product's accessibility.
- Accessibility teams at universities review VPATs before purchase and often conduct manual testing in a sandbox environment.
- Refusal by a vendor to provide testing access is a negative indicator.
- Persistent communication and clear expectations with vendors are key.

Communicating Accessibility to Non-Technical Stakeholders

- Use plain language and real-world demonstrations instead of WCAG jargon.

- Highlight how accessibility barriers impact actual users (e.g., keyboard-only navigation or form completion examples).
- Focus on high-impact issues that block core functions.
- Vendors often don't grasp the user experience implications of noncompliance until shown.

Broader Impact and Policy Context

- VPATs serve as a norm-setting tool for digital accessibility across institutions.
- Even if imperfect, collecting them establishes accountability and expectations.
- There is variability in interpretation and implementation, but VPATs encourage consistent accessibility review before contracts are signed.

Virginia Technology Access Act (HB 2541, 2024)

- New requirement: Vendors must certify that their products conform to accessibility standards (aligned with ADA Title II and WCAG).
- If not fully compliant, vendors must provide a third-party ACR (VPAT) and an Accessibility Roadmap outlining fixes and timelines.
- Applies April 2026 (large institutions) and April 2027 (smaller entities).
- Vendors are responsible for accessibility certification; covered entities must verify compliance or ensure equal access.

Accountability and Follow-up

- Institutions are encouraged to require quarterly check-ins with vendors to monitor progress on accessibility roadmaps.
- Regular meetings increase accountability and ensure incremental improvements.

Closing Takeaways

- VPATs are evolving from voluntary documentation to compliance requirements under Virginia law.
- Effective use of VPATs bridges communication between technical evaluators, procurement, and end users.
- Collaboration among Virginia institutions (via VHEAP, AHEAD, etc.) is essential to defining consistent certification and documentation standards.