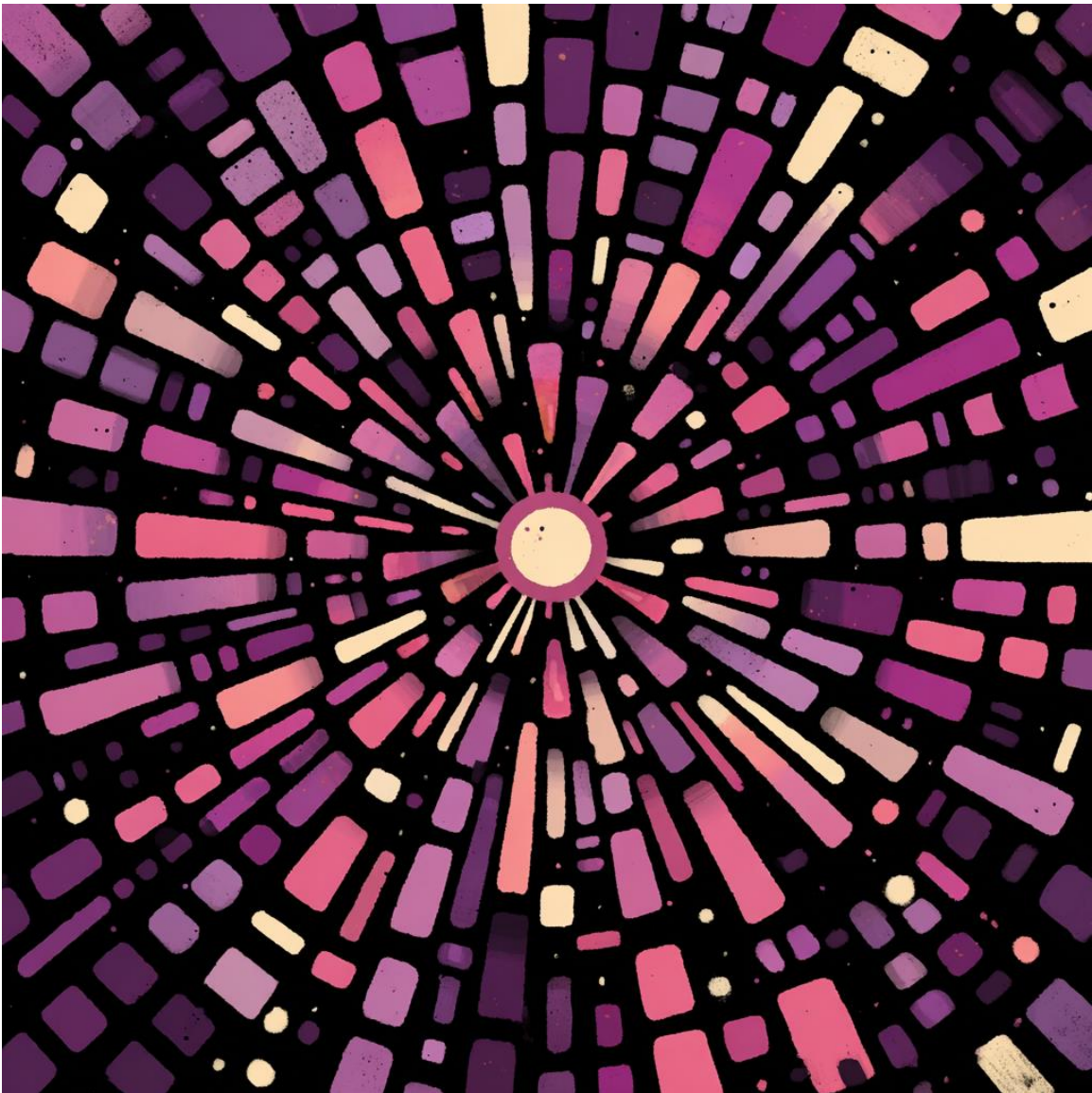


VPAT Quick Guide 2025/6: Web Software Accessibility Reporting

A concise companion to preparing Section 508 and WCAG 2.1 Voluntary
Product Accessibility Templates.



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What is a VPAT and Why It Matters

A VPAT (Voluntary Product Accessibility Template) is basically an accessibility report card. It tells you how well a product, whether software, a website, or an application works for people with disabilities.

When a company fills out a VPAT, they are being transparent:

- What works well for accessibility
- Where there might still be challenges
- Which rules they followed when testing

Agencies often ask for a VPAT before buying technology so they know if it will be usable by all their employees, customers, or citizens.

Which VPAT Template is Correct for Us?

Probably: [VPAT 2.5 – 508 Edition](https://www.itic.org/policy/accessibility/vpat) (<https://www.itic.org/policy/accessibility/vpat>) That's the official format required for U.S. federal agencies and almost always accepted (or preferred) by state governments too.

Why:

- Section 508 is the law federal agencies must follow, so they'll expect vendors to show compliance in that format.
- Most states have adopted WCAG-based laws modeled after 508, so they'll recognize and accept the 508 version too.
- It already references WCAG 2.0 AA criteria (and you can cite 2.1 or 2.2 mappings as "equivalent" where relevant).

What types of companies might need a VPAT?

- **Software companies** - especially SaaS providers or developers
- **Technology hardware firms** - those producing devices like kiosks, printers, or assistive tech.
- **E-learning providers** - education platforms, LMS vendors, and training content creators.
- **Government contractors** - any company bidding on federal, state, or local contracts in the U.S.
- **Web development agencies** - firms building websites or digital tools for public sector or enterprise clients.
- **Financial institutions** - online banking or fintech firms serving the government or large organizations.
- **Healthcare tech companies** - EMR/EHR system providers and telehealth platforms.

Essentially, any business selling digital products or services to governments or accessibility-conscious enterprises should have a VPAT.

What exactly do I do here?

Your task is to work your way down the criteria, give it a level, a remark, and provide the VPAT with your bid/RFP (Request For Proposal) / RFO (Request for Offer). The VPAT is a living document and should be updated with big software updates or approximately every 6 months.

If your software needs some work, declare it in the report, have a mitigation plan, and stick to it.

Remember: When you're finished, remove the instructions and sections that aren't relevant to you or your company: Web/Electronic Docs/Software/Authoring Tool. It's just a distraction for the customer/client.

VPAT Structure Explained

A VPAT has three main structural parts that describe accessibility compliance and conformance:

1. Header Information

This introductory section identifies key details about the product and report:

- Name of the product or service
- Version number or release date
- Report date
- Contact Information for accessibility inquiries
- Evaluation methods used (manual testing, automated tools, assistive technology, etc.)
- Applicable standards/versions (e.g., WCAG 2.1, Section 508, EN 301 549)

This helps readers understand the context and scope of the assessment.

2. Conformance Tables

These are the core of the VPAT, detailed matrices showing how the product meets accessibility criteria:

- Each **table corresponds to a specific standard** (WCAG 2.1, Revised Section 508, EN 301 549).
- For each criterion or success criterion, the table includes:
 - o **Criteria ID and description**

- **Level of conformance** (Supports, Partially Supports, Does Not Support, Not Applicable)
- **Remarks and explanations** describing findings, exceptions, or features.

The goal is to provide transparency about the user experience for people with disabilities.

3. Standards Referenced

The VPAT references specific accessibility standards and guidelines:

- **WCAG 2.1 (Web Content Accessibility Guidelines):** International guidelines for web and digital accessibility.
- **Revised Section 508 (U.S.):** Federal accessibility requirements for technology, based on WCAG.
- **EN 301 549 (EU):** European standard aligned with WCAG for ICT accessibility compliance.
- **Combination:** It's perfectly acceptable to include a mix of WCAG 2.1 and 508 in the same document if that is appropriate for your needs.

VPAT Table layout Example:

1.1.1 Non-text Content	Supports	Images have alt text; decorative icons marked as empty alt.
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Levels at a Glance

Compliance is based on the Web Content Accessibility Guidelines (WCAG) conformance levels: **Level A** (minimum standards), **Level AA** (mid-range, most common), and **Level AAA** (highest, most comprehensive).

Conformance terms within a VPAT:

Level	Plain-Language Definition
Supports	The product fully meets the accessibility requirement. All users can perform the task independently without barriers.
Partially Supports	The feature works for most users but may have minor issues or exceptions that limit complete accessibility.
Does Not Support	The product fails to meet the requirement. Users with disabilities cannot use this feature effectively or independently.
N/A (Not Applicable)	The requirement doesn't apply to this product or feature because the functionality isn't present.

Here's an example of a row with a good explanation and non-conforming explanation.
Remember this report is not pass or fail, just honesty.

Criteria	Level	Good Remark / Explanation	Bad Remark / Explanation
1.1.1 Non-text Content (Level A)	Supports	All meaningful images include accurate, concise alt text describing their purpose.	Some images might have alt text, but others are missing unhelpful (e.g. "image1")

Testing Methods & Tools

Your VPAT should reflect actual testing results.

1. Manual Keyboard Testing

Purpose: Ensure all interactive elements (links, menus, forms, dialogs) are accessible without a mouse.

How to Test:

- Use the Tab, Shift + Tab, Enter and Spacebar keys to navigate.
- Verify focus order is always logical and visible.
- Check modals, skip links, and dropdowns for proper keyboard operation.

2. Screen Reader Testing

Purpose: Confirm content is understandable and operable using assistive technologies.

Popular Screen Readers:

- NVDA (Windows, free) - <https://www.nvaccess.org/download/>
- JAWS (Windows, commercial) - <https://www.freedomscientific.com/products/software/jaws/>
- VoiceOver (macOS/iOS) - Built into Apple devices (Apple VoiceOver Guide)

Tips

- Validate that headings, landmarks, and form labels read correctly.
- Confirm images, dynamic alerts, and ARIA roles provide meaningful context.
- Test navigation with both keyboard and screen reader shortcuts.

Document your methods in the VPAT header.

3. Automated Evaluation Tools

These can quickly detect code-level issues but shouldn't substitute manual review.

- **WAVE (Web Accessibility Evaluation Tool)** - <https://wave.webaim.org/>
Identifies missing alt text, ARIA roles, heading errors, and contrast issues.
- **axe DevTools** (Chrome/Firefox extension) - <https://www.deque.com/axe/>
Generates detailed report of WCAG violations and severity.
- Google Lighthouse (built into Chrome DevTools) - <https://developer.chrome.com/docs/lighthouse/accessibility>
Provides an accessibility score and recommended fixes.

4. Color and Contrast Checking

Ensure sufficient text/background contrast under WCAG 2.1 AA (4.5:1 for body, 3:1 for large text).

- WebAIM Contrast Checker: <https://webaim.org/resources/contrastchecker/>
- Contrast Ratio by Lea Verou: <https://contrast-ratio.com/>
- Accessible Colors App: <https://accessible-colors.com/>

A practical workflow before filling out the VPAT might be:

- **Automated scan first** (WAVE/axe/Lighthouse)
- **Keyboard and focus navigation check.**
- **Screen reader review** using NVDA (or VoiceOver on Mac).
- **Visual verification of contrast and layout.**
- **Record each method and result** in the VPAT remarks column. Document what supports, partially supports, and why.

Writing Effective Remarks

When writing remarks (sometimes called notes or observations) in a VPAT, clarity and precision are essential. They explain how accessibility barriers influence users and what the organization plans to do about them. An effective remark goes beyond saying whether something "supports" or not; it briefly describes the outcome for users and, when possible, provides a timeline or intent for remediation. Clear remarks help procurement reviewers and accessibility specialists understand the current state of compliance and the seriousness of any gaps.

Clear remark: "The drop-down menus can be opened with a keyboard, but the focus indicator is missing, which may confuse keyboard and screen reader users. The issue will be corrected in Q2 2026."

Vague remark: "Keyboard navigation doesn't work properly."

- **Use active voice** - State who or what causes the issue and how users are affected ("Focus does not move to the modal dialog when opened").
- **Note the impact** - Briefly describe the user experience or accessibility barrier ("Screen reader users cannot identify the purpose of unlabeled form fields").
- **Mention planned fixes** - If remediation is scheduled, include timing or intent ("This issue is logged for resolution in the next release").

Together, these practices make your VPAT remarks credible, actionable, and informative for both compliance reviewers and users.

Tip - If you discover recurring issues (like unlabeled buttons across modules), group them under one remark and cross-reference related criteria. It keeps your VPAT concise and avoids duplication.

Common Mistakes to Avoid

1. **Copy-pasting from other VPATs** - Reusing another product's statements leads to inaccurate or irrelevant content. Each VPAT must reflect the actual product being evaluated.
2. **Over-claiming conformance** - Claiming full support without validation or testing undermines trust. Be realistic: "Partially Supports" is acceptable if some features have gaps.
3. **Ignoring mobile or responsive accessibility** - Many VPATs neglect mobile testing. Include evaluation across mobile apps, responsive web design, and touch interactions.
4. **Leaving 'Remarks' blank** - Empty remarks sections suggest missing analysis. Even brief comments indicating "tested via NVDA + keyboard; all labels announced correctly" show diligence.
5. **Inconsistent or missing testing methods** - Failing to document how compliance was verified makes results unclear. Mention tools like NVDA, WAVE, or manual keyboard testing.
6. **Not updating the VPAT over time** - Accessibility compliance evolves - outdated VPATs can misrepresent current capability. Review regularly, especially after design or code changes.
7. **Vague language** - Terms like "works fine" or "appears compliant" lack substance. Describe *what was tested* and *what was found*.

Your VPAT is a legal record. Be precise. Treat it as a verified statement of accessibility performance, not a marketing summary.

Maintaining Your VPAT

Minimum: Review and update annually to ensure accuracy of conformance claims and tool references.

Better practice: Update the VPAT every 6 months or sooner when:

- Major product releases or accessibility fixes are deployed
- New accessibility standards or WCAG versions are published
- New features, UI components, or frameworks are introduced

Tip: Record each update in a short version history table. This shows accountability and helps reviewers track improvements over time.

Example Version Tracking Table

Version	Date	Author/Reviewer	Summary of Changes	Next Review Date
1.0	Jan 20 2025	J. Smith	Initial VPAT creation based on WCAG 2.1 AA audit.	Jan 2026
1.1	Jul 2025	J. Smith, B. Jones	Added mobile testing results and axe scan updates	Jan 2026
1.2	Nov 2025	J. Smith	Revised Remarks after UI redesign and Voice Over retesting	May 2026

Keeping version clarity and update cadence reinforces that your VPAT reflects the current accessibility status—an important trust and compliance factor for procurement and legal defensibility.

Resources & References

Section 508 Standards

- Official Resource: [Section 508 Standards \(U.S. Access Board\)](#)
- Alternate Direct Link: <https://www.hhs.gov/sites/section508/> Covers federal requirements for ICT (Information and Communication Technology) accessibility in the U.S. government.
- The official U.S. reference for formatting and submission: [Section 508 VPAT Guidance](#)

WCAG 2.1 (Web Content Accessibility Guidelines)

- W3C Publication: <https://www.w3.org/TR/WCAG21/> The primary international standard for web accessibility, providing criteria for Levels A, AA, and AAA conformance.

WAI-ARIA Authoring Practices Guide (APG)

- Official W3C Resource: <https://www.w3.org/WAI/ARIA/apg/> Outlines correct use of ARIA roles, states, and properties plus pattern examples for building accessible widgets.

PDF and Accessibility Testing Tools

Tool / Resource	Website Link	Focus Area
WebAIM PDF Accessibility Evaluation	https://webaim.org/techniques/acrobat/	Guidance on making and testing accessible PDFs
Deque axe Tool & Guidelines	https://www.deque.com/tools/axe/	Automated testing and training for WCAG/Section 508
TPGI ARC Toolkit	https://www.tpgi.com/arc-platform/	Browser and PDF accessibility analysis platform

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