



Accessibility and Procurement 101: Checklist

Since NASCIO's original [accessibility and procurement series](#), the emergence of new technology and federal regulations has renewed the push for digital accessibility on a global scale. IT accessibility has made its first appearance on [NASCIO's 2025 State CIO Top Ten Priorities](#), signaling the need for state technology leaders to rethink how their organizations leverage, benefit from and are transformed by digital accessibility on all fronts. This new and improved Accessibility and Procurement 101 Checklist provides a ten-step solution to ensuring accessibility is covered in all stages of the procurement life cycle, with a detailed addendum to further guide CIOs, vendors and all relevant stakeholders.

1. Build the Case for Accessibility

- Demonstrate why accessibility in procurement is crucial for legal compliance, risk mitigation and organizational reputation.
- Use internal advocacy resources and share the benefits of digital accessibility with leadership.

2. Establish and Communicate Accessibility Policy

- Create and implement procurement policies with accessibility embedded into organizational expectations, scope, exceptions and accountability with reference to federal standards (e.g., the DOJ Final Rule on Web and Mobile App Accessibility, WCAG, Section 508).
- Communicate the policies and commitment to digital accessibility internally, with vendors and include it in a general accessibility policy available on the agency's website.
- Include digital accessibility as a core component in state strategic plans.

3. Engage Stakeholders and Raise Awareness

- Plan and execute staff trainings, workshops and informational sessions for procurement teams, IT staff, leadership and end users.
- Ensure that an accessibility expert is involved throughout the procurement cycle.
- Host cross-functional discussions to spread goals, requirements and provide opportunities for users to ask questions.

4. Review Existing Procurement Guidelines

- Update current procurement documents – like solicitations, conduct codes and master service agreements (MSAs) – to include accessibility language and requirements.
- Clearly define roles and responsibilities in policy and documentation – procurement templates can be invaluable here.

5. Perform Market Research and Vendor Assessments

- Research currently available products and vendors and request accessibility conformance reports (ACRs) for all products with a user interface.
- Compare offerings from multiple vendors using accessibility resource centers.

6. Define and Integrate Clear Accessibility Requirements

- Include clear, testable accessibility and usability criteria in all solicitations and contracts with direct references to applicable standards and best practices, especially for development services.

7. Solicit and Evaluate Vendor Accessibility Information

- Require vendors to provide accessibility conformance reports, also known as completed voluntary product accessibility templates (VPATs), or equivalent documentation (accessibility statements, test scripts, results, how remediation was handled) as a mandatory part of proposals.
- Ask questions focused on accessibility and assess responses for product-level and organizational maturity model.

8. Test and Validate Product Accessibility

- Conduct or mandate accessibility testing for high-impact products, services and/or projects over a certain monetary threshold, including user testing and third-party evaluations to ensure products meet accessibility requirements before final acceptance.
- Ensure disabled citizens are included in all areas of testing and validation where applicable.
- Include accessibility verification as part of post-contract governance and warranties.
- Conduct risk assessments and build a corrective action plan in the event of end-user issues.

9. Prioritize Remediation and Ongoing Improvement

- Build an inventory of existing digital assets, categorize and prioritize them for remediation and strategically address accessibility gaps.
- Monitor products after implementation and integrate remediation into contract terms as needed.
- Agencies should be able to request updated ACRs over the life of the asset in case a vendor update impacts the user interface.

10. Monitor, Review and Ensure Accountability

- Establish ongoing, periodical monitoring (at least every year) of policy documentation, implementation, contract compliance and product performance.
- Assign clear accountability for accessibility at the organization and procurement officer level and consider hiring an [IT accessibility coordinator](#) for this.
- Use feedback from stakeholders and users for continuous improvement.
- Share lessons learned with internal and external communities to build momentum and trust and to refine approaches.



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Addendum

1. Build the Case for Accessibility: A strong business case puts [accessibility in line with the organization's mission](#), legal obligations and social responsibilities. CIOs should communicate that procuring accessible products and services is vital for serving all users, employees, customers and disabled citizens. Beyond compliance with the [2024 DOJ Final Rule on Web and Mobile App Accessibility](#) and other relevant laws, accessible tech [reduces risks, boosts reputation and expands innovation opportunities](#). The business case should be shared internally and externally to inspire partners and vendors to prioritize accessibility. Provide examples of the benefits of digital accessibility, like improved service delivery and enhanced government participation.

2. Establish and Communicate Accessibility Policy: Developing a [clear, written accessibility procurement policy](#) is crucial for guiding internal teams and communicating expectations to vendors. The policy should clearly define the scope of services it applies to, reference state and/or federally accepted standards, outline goals and specify who is accountable for compliance. The policy, once created, should be easily accessible to staff and sent to both current and potential service providers. Accessibility should also be incorporated in state strategic plans to establish it as a non-negotiable value from the start.

3. Engage Stakeholders and Raise Awareness: Involving a diverse set of stakeholders is critical for a successful, sustainable procurement program. CIOs should gather internal teams, users with disabilities, procurement staff, general counsel and external partners to share perspectives and come to a common understanding. [Organize ongoing training sessions and workshops](#) so all relevant stakeholders are equipped with knowledge of accessibility standards, how people with disabilities use technology and current best practices. Use these engagements to clarify roles, set expectations and gather feedback for continuous improvement. Involving user groups and disability advocacy organizations also offers lived experience that can inform requirements.

4. Review Existing Procurement Guidelines: [Assessing and updating procurement documents](#) like vendor codes of conduct, contract templates and solicitation language is critical for embedding accessibility throughout the organization. Conduct a strategic review to ensure these documents explicitly mention accessibility, point to the relevant standards and clarify responsibilities at each stage of procurement. Revisions should close gaps between current practice and best practice, making certain that accessibility is considered early and thoroughly. Templates should explain how accessibility will be evaluated, tested and maintained post-purchase.

5. Conduct Vendor Assessments and Market Research: Before issuing solicitations, [conduct thorough market research](#) to understand vendor accessibility capabilities and available accessible solutions. Request preliminary accessibility documentation such as ACRs (completed VPATs) from vendors and analyze their responses for completeness and honesty. Gather information on vendor practices, support for accessibility standards and their experience serving customers with disabilities. Use discovery meetings to engage with vendors early and share your expectations and requirements, for example, discussing remediation processes for existing accessibility gaps. By identifying vendors with demonstrated accessibility commitments up front, agencies can encourage industry-wide improvement and reduce later risks.

6. Define and Integrate Clear Accessibility Requirements: Accessibility requirements should be included in all relevant procurement documents, including solicitations, contracts and evaluation rubrics. [Requirements must cite specific, testable standards](#)—such as WCAG, Section 508, or [EN 301 549](#)—detailing their application to all technology and services obtained. Include definitions of what constitutes compliance, criteria for acceptance and explicit processes for handling exceptions or requesting remediation when necessary. Evaluation criteria should be transparent so vendors know exactly how their solutions will be judged. This proactive clarity reduces ambiguity, accelerates procurement processing and strengthens accountability. Agencies should periodically review and update these requirements to reflect evolving standards and organizational needs.

7. Solicit and Evaluate Vendor Accessibility Information: During the procurement process, require vendors to submit complete accessibility documentation, such as VPATs or other types of ACRs, and evidence of testing with disabled users. Evaluation panels should be trained to critically analyze these submissions, examining not only compliance checkboxes but also evidence of ongoing commitment and transparency about known limitations. Ask direct questions about the vendor's accessibility practices, support plans and experience with diverse user needs. This information should be weighed heavily in procurement decisions—solutions with timely, honest, actionable responses and willingness to remediate earn preference. Effective evaluation focuses on both product accessibility and organizational maturity.

8. Test and Validate Product Accessibility: After selecting a solution, [it is crucial to verify accessibility](#) through internal or external independent testing, expert review and user-based trials. Pilot deployments should include testing by people with diverse disabilities using assistive technologies, in addition to technical conformance checks against standards. This is also the time to conduct risk assessments, as some agencies may be mandated to procure products with market availability gaps. This is when exceptions, justification for procuring and a corrective action plan for potential user interface issues are needed. Findings from this process must inform final acceptance: products or services should only be approved if they meet accessibility requirements under real-world conditions. If issues are found, enforce contract terms for remediation prior to full rollout. Document the testing and validation process for transparency and as a record for future procurements. Regular retesting, especially after upgrades or new feature deployments, ensures continued accessibility.

9. Prioritize Remediation and Ongoing Improvement: Maintain an inventory of [procured digital assets, identifying and classifying those needing accessibility remediation](#). Prioritize fixes based on user impact, legal risk and business needs, integrating remediation timelines and requirements into active contracts. Regularly engage vendors to track their progress, especially if there is an exception in place, and ensure users are aware of alternative access when immediate remediation isn't feasible. Establish feedback channels for employees and end-users to report issues and suggest improvements, using their input to refine both procurement and support practices

10. Monitor, Review and Ensure Accountability: Effective accessibility programs require routine monitoring, formal reviews and strong accountability measures. Set a review schedule (at least biennially) to reassess policy implementation, procurement practices and technology accessibility outcomes. [Hire an accessibility coordinator](#)/officer and/or a dedicated accessibility team with oversight roles and clear reporting duties, tied to regular progress reports. Include people with disabilities in monitoring and review committees to ensure evaluations reflect actual user experience. Share outcomes and improvements within the organization and with peer agencies to foster transparency, celebrate successes and learn from setbacks. This systemic approach drives continual improvement and ensures accessibility remains central to all technology procurements.

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