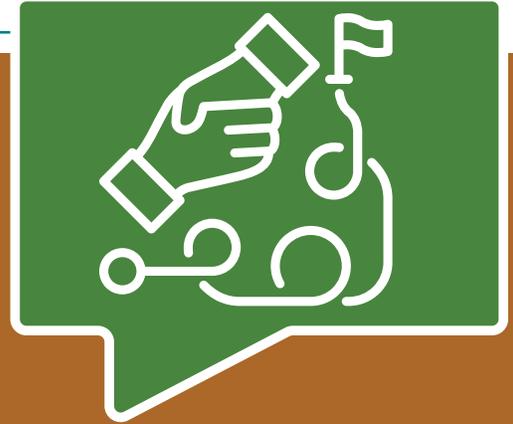# From Frustration to Shared Accountability:
A New Procurement Playbook

By embedding accessibility expectations into procurement, fostering open collaboration with vendors and applying accountability measures throughout the contract lifecycle, districts can influence real progress.

This playbook outlines how districts can build an accessibility-first procurement process, complete with a practical checklist and a case study showing how district partnerships can turn frustration into shared accountability and measurable improvement.

STEP 1: Build accessibility into procurement policy.

When accessibility requirements are embedded into procurement policies and processes, they establish systemic accountability that drives vendors to maintain compliance over time.

Districts can operationalize accessibility in purchasing through an "Embed and Add" approach:

Embed in existing procurement tools:

✅ Require accessibility compliance in all requests for proposals (RFPs), requests for quotes (RFQs) and requests for information (RFIs), explicitly referencing the applicable standards (i.e., WCAG 2.1 AA) to eliminate ambiguity. This makes accessibility an expectation from the first moment a vendor engages with a district.

✅ Include accessibility as a weighted scoring criterion in evaluation matrices, on par with cost and functionality, so that it cannot be sidelined during decision making.

✅ Make accessibility a required component of all vendor-led training for district personnel.

✅ Incorporate legally binding accessibility language in contracts to hold vendors accountable for maintaining product accessibility over time.

- Include clauses covering remediation responsibilities, costs and timelines for any undisclosed or newly discovered barriers that arise.

- Require accessibility for future updates, ensuring that any new feature or functionality meets the same accessibility assurances.

Add vetting components to vendor requirements:

✅ Require current documentation demonstrating a vendor's ongoing conformance with accessibility standards, including:

- A completed Accessibility Conformance Report (ACR) that details how well the product supports specific WCAG standards. *[For more on ACRs, see Step 2 below.]*

- A statement describing the vendor's organizational commitment to accessibility. *[See Step 3 for details.]*

This foundational work must occur before procurement begins. Embedding these expectations into the policies and tools procurement teams already use ensures consistency and accountability — removing reliance on individual staff knowledge or memory and making accessibility a standard part of every purchase.

STEP 2: Verify accessibility claims.

Every product or service a district uses, from instructional software to HR systems, should come with documentation from the vendor that demonstrates how well it meets accessibility standards. Vendors commonly use a Voluntary Product Accessibility Template (VPAT), which provides a checklist of testing criteria tied to a specific standard (e.g., WCAG, Section 508 or international standards).

An Accessibility Conformance Report, or ACR, is a vendor's completed VPAT. Using defined conformance levels — Supports, Partially Supports or Does Not Support — the ACR provides in-depth detail about a specific product's accessibility status. This helps districts identify potential barriers before purchasing.

Like an ACR for digital tools, the U.S. Department of Education's National Instructional Materials Accessibility Standard (NIMAS) ensures textbooks and other learning materials can be quickly converted into accessible formats such as Braille or audio. While best known among special education specialists, NIMAS-informed procurement helps ensure all students receive accessible materials at the same time as their peers.

"Partially Supports" does not equal "Noncompliant"

Not every product will check every box right away, and that's okay. A designation of "Partially Supports" can be acceptable if the vendor is upfront about limitations and actively working to resolve them. Ask for a documented remediation plan and track their progress over time to ensure accessibility keeps improving. What matters most is transparency and a concrete improvement plan. Vendors who acknowledge gaps and commit to remediation demonstrate the accountability districts should expect.

When reviewing ACRs, districts should look for the following:

✅ **Currency:** The ACR should reflect the most recent version of the product to ensure it accurately reflects the product's current state (e.g., after a new feature is implemented).

✅ **Comprehensiveness:** It should cover all applicable standards and product components.

✅ **Transparency:** The report should clearly outline both strengths and known limitations in the product's accessibility features.

Districts should also confirm whether the ACR is internally produced or verified by a third party. Third–party validation adds credibility and helps reduce bias in accessibility claims. As part of the procurement or renewal process, districts can require third–party verification as a condition for selection, signaling that accessibility is a non–negotiable expectation.

Procurement teams should review ACRs carefully to understand how accessibility was tested, which tools were used and who within the vendor organization serves as the accessibility point of contact.

A knowledgeable and informed procurement team is the backbone of accessible purchasing, but they can't do it alone. It depends on collaboration across departments. That doesn't mean everyone needs to become an expert in purchasing or accessibility to contribute. Instead, each department brings its own lens and expertise to help verify that a product truly works for all users.
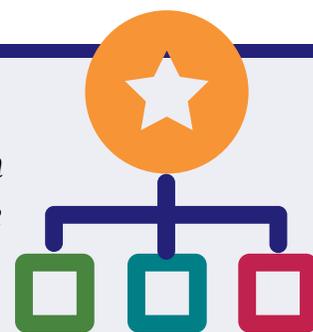
⭐ Procurement staff review ACRs and other documentation to confirm that vendors' submissions are current, complete and evidence-based.

⭐ IT teams test compatibility with assistive technologies and ensure that tools align with district systems and technical standards.

⭐ Curriculum and special education staff evaluate whether digital materials are usable and engaging for all students, including those with disabilities.

⭐ Communications teams model the district's commitment to accessibility in digital and public-facing content, setting a districtwide standard.

Together, these perspectives make procurement a shared safeguard that prevents vendors from making promises that sound good but fall short. A collaborative, informed team avoids costly mistakes and ensures that every purchase supports the district's ongoing commitment to accessibility and inclusion.

STEP 3: Evaluate vendor accessibility maturity.

Beyond documentation, it's equally important to assess how deeply accessibility is embedded in a vendor's operations and culture — in other words, its accessibility maturity. A technically compliant product today can quickly become noncompliant if the vendor lacks internal expertise or accountability structures.

Procurement and IT staff can use questions like these during evaluations or product demonstrations to gauge vendor commitment:

- **?** What accessibility standards guide your product development and updates?

- **?** Do you have a designated accessibility manager or policy?

- **?** How often do you test for accessibility, and what tools or user groups do you involve?

- **?** What training or support do you offer users to maximize accessibility features?

For vendors still developing their accessibility practices, these questions can serve as a coaching tool. Establishing expectations early helps vendors understand that meeting accessibility standards is both a contractual obligation and a market imperative.

STEP 4: Sustain collaboration and continuous improvement.

Digital accessibility is not static. It evolves as technology, standards and user needs change. Districts and vendors that collaborate on accessibility set a foundation for innovation as well as inclusion.

Ongoing accessibility audits, transparency about known challenges and a culture of shared responsibility between customers and vendors ensure that accessibility doesn't fade after procurement, but becomes an ongoing commitment embedded in daily practice.

ACCESSIBILITY-FIRST PROCUREMENT CHECKLIST:

- ✓ Require WCAG 2.1 AA conformance in all requests for information (RFI) and requests for proposals (RFP).

- ✓ Score accessibility alongside cost, functionality and reputation.

- ✓ Include accessibility as a legally binding contract clause, including vendor responsibility for remediating any future barriers that arise.

- ✓ Request live demonstrations of accessibility features such as keyboard-only navigation or captioning.

- ✓ Verify vendor accessibility conformance reports (ACR) and accessibility maturity statements through internal or third-party review.

- ✓ Conduct regular post-purchase audits to ensure accessibility is maintained.

Note: ChatGPT was used to assist with synthesizing research, copy editing and language refinement in some sections of this report. All analysis and interpretation were conducted by the human authors, and all AI-assisted content was reviewed, verified and edited by humans prior to publication.