Government Website Accessibility Checklist 2028

44 items. Every one says how to check it and what a pass looks like.

No email address, no form, no “we will send it to you”. The file is a link.

Version 1.3 · 8 September 2026 · WCAG 2.1 AA

12 of these 44 items can be checked by a tool. 32 need a person.

There is no total at the bottom of this checklist and there never will be. The boxes are for a pen or a printer.

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A — Before you check anything

☐ A1 Name the person responsible

Why 28 CFR 35.107 requires a public entity with 50 or more employees to designate a responsible employee and to publish grievance procedures. Most have neither, and the first letter an entity receives asks for both by name.

How Ask your clerk for the adopted resolution or the personnel file that names the ADA coordinator. Then search your own website for the name and see whether a resident could have found it.

Pass A named person, an email address and a published grievance procedure, all three reachable from your website without knowing who to ask.

WCAG — · Automated? No

☐ A2 Find out which deadline applies to you

Why The federal date depends on your entity type and your population, and a state rule may already apply to you today. Working to the wrong date is how a two-year programme becomes a three-month one.

How Take your entity type and your population from your own most recent census figure. Public entities of 50,000 or more have 26 April 2027. Interim final rule; a legal challenge is pending. Under 50,000, and special districts of any size, have 26 April 2028. Interim final rule; a legal challenge is pending. Then check whether your state has its own statute — Colorado’s has been in force since 1 July 2025.

Pass A date written down, with the rule number beside it, and a note of any state statute that applies sooner. The note repeats the rule status, because a date quoted without it is a date somebody will plan against as though it were settled.

WCAG — · Automated? No

☐ A3 Write down what counts as your website

Why The obligation covers the web content and mobile apps a public entity provides, which includes the systems a vendor runs on your behalf. The agenda portal on a vendor’s hostname is in scope and is almost never in the list.

How List every address a resident reaches from your homepage, including the ones that leave your domain. Read your own footer, your payment links and the links inside your council agendas.

Pass One list, naming every hostname, who runs it, and which department owns the relationship.

Section D is the same list read a second way.

WCAG — · Automated? No

☐ A4 Count your documents

Why The number is always larger than the guess, and documents are the largest part of the work. A city of 78,877 people had 1,180 of them.

How Search your site for each extension in turn — `filetype:pdf site:yourdomain.gov` in a search engine gets you an order of magnitude in a minute. Then ask whoever runs the agenda portal for their own count, because those files are rarely indexed.

Pass A number you are willing to say out loud in a budget meeting, and the date you counted it on.

WCAG — · Automated? No

B — The twelve checks a person can do in an afternoon

Ordered by how often they fail on a US government site, which is not the order WCAG puts them in.

☐ B1 Unplug the mouse and use the site

Why Someone using a keyboard, a switch or voice control reaches every control the same way: in order, one at a time. If a control cannot be reached that way, it does not exist for them.

How Put the mouse out of reach. Press Tab from the top of the page to the bottom of the footer, then Shift and Tab back up. Open every menu, complete the search box, and try to leave every component you entered.

Pass Every link, button, field and menu can be reached and operated, in an order that matches what you see, and nothing holds focus once you try to leave it.

WCAG 2.1.1 Keyboard (A) · Automated? Partly

☐ B2 Watch where the focus ring goes, and whether you can see it

Why A keyboard user who cannot see where they are has to guess what pressing Enter will do. The most common cause is a stylesheet that removed the browser's own outline and put nothing back.

How Repeat B1 and watch only the ring. Note every stop where it disappears, where it sits behind a sticky header, or where it is a faint dotted line on a coloured button.

Pass At every stop there is an indicator you can see from normal reading distance, it is never clipped by another element, and it never vanishes.

WCAG 2.4.7 Focus Visible (AA) · Automated? Partly

☐ B3 Zoom to 400% in a 320 px wide window

Why Someone who magnifies the page four times is reading it in a column about as wide as a phone. If the page still asks them to scroll sideways for every line, reading it is work nobody sustains.

How Make the browser window 1,280 px wide, set the zoom to 400%, and read the page. That is the 320 px viewport the criterion names. Then read a long sentence and a wide table.

Pass No horizontal scrollbar on the page itself. A data table may scroll inside its own region. If you have to scroll sideways to read a sentence, it fails.

WCAG 1.4.10 Reflow (AA) · Automated? No

☐ B4 Check every image says something useful or says nothing at all

Why A decorative image with alternative text is as wrong as a meaningful one without it — the first makes a screen reader read out `banner_final_v2.jpg`, the second removes the information entirely.

How Turn images off in the browser, or read the page with a screen reader, and go down the page asking one question per image: if this were a sentence, what would it say? An engine will tell you which images have no alternative text at all; it cannot tell you that a description is wrong.

Pass Every image either says something useful or says nothing at all, and no description begins with “image of” or repeats the text beside it.

WCAG 1.1.1 Non-text Content (A) · Automated? Partly

☐ B5 Check the text against its background

Why Low-contrast text is the most common failure on a government website and the cheapest to fix, because it is almost always three or four values in one stylesheet.

How Use your browser’s own inspector — it reports the contrast ratio on any text node — or any free contrast checker with the two hex values. Check the body text, the muted “helper” text, the link colour, and the text sitting on your header image.

Pass Every piece of body text reaches 4.5:1 against what is behind it. Text at 24 px, or 18.66 px bold and above, reaches 3:1.

WCAG 1.4.3 Contrast (Minimum) (AA) · Automated? Yes

☐ B6 Check buttons, borders and icons against their background

Why The same rule applies to the things that are not text, at a lower threshold, and it is the one people forget: a field whose border is a pale grey line is a field somebody cannot find.

How Check the outline of every input, the edge of every button, the focus ring, and any icon that carries meaning on its own. Judge which graphics are meaningful — a tool cannot decide that for you.

Pass Every control boundary and every meaningful graphic reaches 3:1 against what sits behind it, in every state including focus and hover.

WCAG 1.4.11 Non-text Contrast (AA) · Automated? Partly

☐ B7 Read the headings on their own and see if they are an outline

Why A screen reader user moves through a page by its headings, the way a sighted reader moves by skimming. A page whose headings were chosen for their font size is a page with no outline at all.

How Read only the headings, top to bottom. Check there is exactly one first-level heading, that no level is skipped, and that nothing is a heading because it needed to be bigger.

Pass The headings alone read as a table of contents for the page, in order, with no level skipped and nothing missing.

WCAG 1.3.1 Info and Relationships (A) · Automated? Partly

☐ B8 Click every form label and see if the field takes focus

Why A label that is only text beside a box is not a label. Clicking it is the two-second test for whether the two are connected, and the connection is what a screen reader announces and what voice control targets.

How Click the words, not the box, on every field of every form you have — search, contact, permits, the newsletter box in the footer. Then check that a field whose only label is placeholder text still has one once you start typing.

Pass Clicking the label moves focus into its field, every field has a visible label that stays visible, and no field is labelled by its placeholder alone.

WCAG 4.1.2 Name, Role, Value (A) · Automated? Partly

☐ B9 Submit a form wrong on purpose

Why The moment a form rejects something is the moment it is least usable, and it is almost never tested. A red border and nothing else tells a screen reader user that nothing happened.

How Leave a required field empty, put letters in a date, and submit. Then do the same thing with the keyboard only, and note where focus lands and what is announced.

Pass The error says what is wrong and how to fix it, in text, beside the field and in a summary at the top; focus moves to the summary; and nothing that was typed is lost.

WCAG 3.3.1 Error Identification (A) · Automated? No

☐ B10 Read the link text with the page hidden

Why Screen reader users list the links on a page and pick one. Eleven links reading “read more” are eleven identical choices, and the one that says “click here” says nothing at all.

How Copy the page’s links into a list, or use a screen reader’s link list, and read them without the surrounding text. An engine will find an empty link; it cannot tell you that “read more” is ambiguous.

Pass Every link says where it goes without the sentence around it, and no two links with different destinations read the same.

WCAG 2.4.4 Link Purpose (In Context) (A) · Automated? Partly

☐ B11 Check the page title and the page language

Why The title is what a browser tab, a bookmark and a search result all show, and the language attribute is what decides whether a screen reader reads your page in English or in the voice it happened to be set to.

How Read the browser tab on ten pages and see whether any two are the same. Then view the source and check that the opening `html` tag carries `lang="en"`, or the language the page is actually written in.

Pass Every page has a title that names that page first, no two pages share one, and every page declares its language.

WCAG 2.4.2 Page Titled (A) · 3.1.1 Language of Page (A) · Automated? Yes

☐ B12 Play a video with the sound off

Why A council meeting recording without captions is a public meeting somebody could not attend. It is also the item most often marked done on the strength of the platform’s automatic captions.

How Play each video with the sound off and read the captions against what is being said. Check the names of speakers, the place names, and any number that matters.

Pass Auto-generated captions are a failure, not a partial pass. If the captions came from the platform and nobody corrected them, the item does not pass.

WCAG 1.2.2 Captions (Prerecorded) (A) · Automated? No

C — Documents

A city of 78,877 people had 1,180 documents on its website, and 412 of them were not accessible.

Word, Excel and PowerPoint files are recorded but not yet validated, and say so. Files over 25 MB are not checked, and say so.

☐ C1 Check that every PDF is tagged

Why An untagged PDF is a picture of a document as far as a screen reader is concerned: no headings, no reading order, no table structure. It is the single fact that decides whether the rest of this section is even checkable.

How Open the file and look at the tags panel in your PDF reader, or run the free veraPDF validator against the PDF/UA-1 profile. Either answers it outright.

Pass The document has a structure tree, and the tags are headings and paragraphs rather than one undifferentiated block.

WCAG 1.3.1 Info and Relationships (A) · Automated? Yes

☐ C2 Check every PDF has a real title, and that it opens showing it

Why The title is what a reader hears first and what a bookmark records. A file that announces itself as `Microsoft Word - agenda_final_v3.docx` has told the reader nothing and told them it was not checked.

How Read the document properties, and check the viewer preference that makes the reader show the title instead of the filename. Treat these as missing, not present: `untitled`, `document`, `document1`, anything beginning `Microsoft Word -`, and any title identical to the filename.

Pass A title a person wrote, describing the document, and the reader shows it in the window bar rather than the filename.

WCAG 2.4.2 Page Titled (A) · Automated? Yes

☐ C3 Check every PDF says what language it is in

Why Without a language, a screen reader reads an English agenda in whatever voice it was last set to. On a bilingual site it is the difference between a Spanish notice being read and being mangled.

How Read the document properties for the language setting, or run the same free validator. Check any passage in a second language separately — a Spanish paragraph inside an English document needs its own.

Pass The document declares its language, and any passage in another language declares its own.

WCAG 3.1.1 Language of Page (A) · Automated? Yes

☐ C4 Read the document in tag order and see if it matches the page

Why Tags can be present and in the wrong order, which is the normal result of exporting a two-column agenda. The reader gets the left column and the right column interleaved, sentence by sentence.

How Read the document with a screen reader, or step through the tags panel, and compare what you hear with what you see. Pay attention to headers, footers, page numbers, sidebars and anything in two columns.

Pass What is read matches what is seen, in the order a person would read it, with running headers and page numbers marked as decoration rather than read out mid-sentence.

WCAG 1.3.2 Meaningful Sequence (A) · Automated? No

☐ C5 Check the tables are tables, and that the header row is marked as one

Why A budget table read without its headers is a list of numbers. A validator can see that something was tagged as a table; it cannot tell you that a layout grid was tagged as one or that the wrong row was marked as the header, and both are common.

How For each table, ask a screen reader to read one cell in the middle and listen for the column and row it names. Then look for tables that are not tables — three columns of text laid out in a grid for appearance.

Pass Every table of data has its header cells marked as headers, every cell is announced with its column, and nothing that is only a layout is tagged as a table.

WCAG 1.3.1 Info and Relationships (A) · Automated? No

☐ C6 Check the scanned pages are real text, and that the text is right

Why A scanned minute book is an image. Recognition software turns it into text, and the text it produces is wrong often enough that a resident searching for their own street will not find it.

How Select a paragraph with the mouse and see whether anything is selected, then search the document for a word you can see on the page. Read the recognised text of a page against the page itself — names and numbers first.

Pass Text is selectable and searchable throughout, and the text under a scan says what the scan says. A page of recognised text nobody read is not a pass.

WCAG 1.4.5 Images of Text (AA) · Automated? No

☐ C7 Check every image in a document describes what it is there for

Why A map of a proposed annexation carries the whole point of the notice. A validator will report a figure with no description; it will not report a description that is wrong, and in a board packet most of the wrong ones say “image”.

How Open the tags panel and read each figure’s description against the figure. Decide which images carry meaning and which are decoration, and mark the decoration as an artifact so it is skipped rather than read.

Pass Every image that carries meaning has a description a reader could act on, and every decorative image is marked as decoration.

WCAG 1.1.1 Non-text Content (A) · Automated? No

☐ C8 Check anything longer than 20 pages has bookmarks that match its sections

Why A 240-page board packet with no bookmarks can only be read from the top. A reader looking for one agenda item scrolls for it, and somebody using a screen reader scrolls through all of it.

How Open the bookmarks panel and compare it with the document’s own table of contents. A list that exists but names `Heading 1`, `Heading 2`, `Heading 3` is a list nobody can navigate by.

Pass Every document over 20 pages has bookmarks, they name the sections a reader is looking for, and they are nested the way the document is.

WCAG 2.4.5 Multiple Ways (AA) · Automated? No

☐ C9 Count the documents that are not PDFs, and the ones nothing will check

Why Word, Excel and PowerPoint files are published on government sites constantly and are left out of most inventories. So are the very large files — a 40 MB scanned plan set is skipped by most tooling without saying so.

How Count each extension separately, and count the files over 25 MB. Then decide, in writing, which of them get remediated, which get replaced with an accessible page, and which are archived.

Pass A count per format and a count of the oversized files, each with a decision beside it. “Word, Excel and PowerPoint files are recorded but not yet validated” is an honest line in an inventory; leaving them out is not.

WCAG — · Automated? No

D — The systems that are not on your website

These are in scope for your obligation and they are not on your domain.

A VPAT older than 24 months is stale. Zero “Does Not Support” entries in a vendor’s VPAT is a red flag, not a green one.

☐ D1 Check the agenda and minutes portal

Why It is where the public record lives, it is almost always on a vendor's hostname, and it is the system residents are most often trying to use when they complain.

How Click through from your own site and read the address bar — it is usually a host like `granicus.com` or `civicplus.com`. Ask the vendor for their current conformance report, check its date, and read what your contract says about accessibility.

Pass The hostname is in your scope list, you hold a conformance report dated within 24 months, somebody has read it, and you know what your contract says about accessibility.

WCAG — · Automated? No

☐ D2 Check online payments

Why A utility bill somebody cannot pay is a service they are excluded from, and the payment flow is usually the one system nobody in the building can change.

How Start a payment and read the address bar at each step — the handoff often happens silently. Then ask the vendor for their conformance report, check its date, and read the contract.

Pass The hostname is in your scope list, you hold a conformance report dated within 24 months, somebody has read it, and you know what your contract says about accessibility.

WCAG — · Automated? No

☐ D3 Check permits and licensing

Why These are long multi-step forms with file uploads and session timeouts, which is the hardest thing on this list to get right and the most expensive to be wrong about.

How Begin an application and note every hostname it passes through — `accela.com` and `tylertech.com` are the usual ones. Ask for the conformance report, check its date, and read the contract.

Pass The hostname is in your scope list, you hold a conformance report dated within 24 months, somebody has read it, and you know what your contract says about accessibility.

WCAG — · Automated? No

☐ D4 Check job applications

Why An application system somebody cannot use is a job they cannot apply for, and it is the one on this list most likely to produce a complaint that names a person.

How Start an application, note the hostname, and try the whole flow from the keyboard. Ask the vendor for the conformance report, check its date, and read the contract.

Pass The hostname is in your scope list, you hold a conformance report dated within 24 months, somebody has read it, and you know what your contract says about accessibility.

WCAG — · Automated? No

☐ D5 Check the library catalogue

Why The catalogue and its ebook platform are separate systems, usually from separate vendors, and the second one is almost never in anybody's scope list.

How Search the catalogue, then borrow something, and note every hostname on the way. Ask each vendor for a conformance report, check the dates, and read both contracts.

Pass The hostname is in your scope list, you hold a conformance report dated within 24 months, somebody has read it, and you know what your contract says about accessibility.

WCAG — · Automated? No

☐ D6 Check maps and GIS

Why A zoning map is often the only published form of the information, and an interactive map is the hardest kind of content to make usable without sight. The answer is usually a text equivalent rather than a better map.

How Open each map, note the hostname, and try to get the same answer from the keyboard alone. Ask the vendor for the conformance report, check its date, read the contract, and write down what the text equivalent is going to be.

Pass The hostname is in your scope list, you hold a conformance report dated within 24 months, somebody has read it, and you know what your contract says about accessibility.

WCAG — · Automated? No

E — What to write down

This is the part a demand letter tests, and it is the part nobody does.

☐ E1 Write down what was tested, when, by whom, and with what

Why A result with no scope is a result nobody can rely on a year later. “The site was tested” and “eight page templates were tested on 14 September 2026 with NVDA 2026.1 and Firefox” are different claims, and only the second survives a question.

How For every round of testing, record the pages or templates covered, the date, the person, the tool and its version number. A spreadsheet is enough to start.

Pass Any row in the record answers what was tested, when, by whom and with which tool at which version, without anyone having to remember.

WCAG — · Automated? No

☐ E2 Write down what was fixed, by whom, and on what date

Why The gap between “we fixed it” and a record of who changed what, when, is the gap a demand letter is written into.

How Record the change beside the finding it answers rather than in a separate ticket queue. Name the person, the date and what actually changed.

Pass Every finding you consider resolved has a dated entry naming the person who resolved it.

WCAG — · Automated? No

☐ E3 Write down what was verified, how, and what the verification covered

Why A submitted fix is not a confirmed fix. Verification is a separate event with its own method and its own scope, and collapsing the two is how a programme reports work it has not checked.

How For each fix, record who re-tested it, by which method — a person or a tool — and on which pages. Write the scope into the sentence: “verified fixed for this test scope”, never “verified”.

Pass Every verification names an actor, a method and a scope, and it is a separate entry from the fix it checked.

WCAG — · Automated? No

☐ E4 Write down what you decided not to fix, why, who decided, and when it is next looked at

Why Deferring work is a legitimate decision and an undated one is how a deferral becomes permanent without anybody choosing that. The reason is also the part a reviewer reads first.

How For each deferral, record the owner, the reason in their own words, and a review date. “Legacy section scheduled for replacement Q3 2027” is a reason; “low priority” is not.

Pass No deferred item is without an owner, a written reason and a date it is looked at again.

WCAG — · Automated? No

☐ E5 Write down what is out of scope, and under which exception

Why The rule names specific exceptions — archived content, pre-existing documents, third-party content not under contract, individualised password-protected documents, older social media posts, and content whose failure is de minimis. A claim that names a whole section or a file type is the one that gets pulled.

How For each claim, name the specific page or document, the exception it falls under, who decided, and when. Treat the de minimis claim as the one you will be asked about first, and write down why that particular failure has so minimal an effect.

Pass Every exception claim names a specific item, a specific exception, a person and a date, and reads as a decision rather than as a category.

WCAG — · Automated? No

☐ E6 Write down what a resident told you, and what happened next

Why A report from a member of the public is the highest-quality finding you will ever get, and the record of what you did about it is what shows a programme is running rather than filed.

How Give people one address or form to report a barrier, acknowledge every report, and record what was done and when it was closed. Say so even when the answer is that nothing will change, and say why.

Pass Every report has an acknowledgement, an outcome and a date, and the reporter was told the outcome.

WCAG — · Automated? No

☐ E7 Decide where all of this lives, and who can find it without asking

Why This is the part a demand letter tests, and it is the part nobody does. A record held in one person's inbox is a record that leaves with them.

How Pick one place — a shared drive, a system, a folder — write down where it is, and tell the clerk, the attorney and the department heads. Then check that somebody other than you can open it.

Pass Two people who are not you can produce the whole record from memory of where it is, within a day, without your help.

WCAG — · Automated? No

F — What no checklist can tell you

☐ F1 Plan for the barriers no tool reports

Why Automated testing detects roughly 30–40% of real barriers. Manual testing covers the rest.

How Read the `Automated?` column of the criterion map below and count the items it answers for you. Then put the rest into a plan with names and dates against it.

Pass Your plan has time in it for the work no tool reports, and the person who has to do that work knows it is theirs.

WCAG — · Automated? No

☐ F2 Know how much of the standard a tool can see

Why 16 of the 50 WCAG 2.1 AA success criteria have any automated coverage — 32%.

How When a vendor shows you a number, ask which criteria it covers and which it does not. The

answer is a list, and a vendor who cannot produce one is reporting on a subset without saying which.

Pass You can name the criteria your tooling does not cover, and nobody in your organisation reads a scan result as a statement about the whole standard.

WCAG — · Automated? No

☐ F3 Treat this as a triage, not an audit

Why This checklist is a triage, not an audit. It will not produce a conformance claim.

How Use it to find out where the work is and how much there is. When you need a conformance claim, that comes from a completed evaluation against every applicable criterion, with its scope written down.

Pass Nothing produced from this checklist is presented to a council or a court as an audit.

WCAG — · Automated? No

☐ F4 Ask a person who uses a screen reader to do one real task on your site

Why Nothing here tells you whether a real person can complete a real task on your site. Ask one.

How Pick a task somebody actually comes to you for — pay a bill, find a meeting agenda, apply for a permit. Ask a resident who uses assistive technology, or a local disability organisation, to try it. Pay them for their time.

Pass Somebody who does not work for you has completed a real task on your site, and you wrote down where it went wrong.

WCAG — · Automated? No

☐ F5 Do not read a finished checklist as a conformance claim

Why Passing every item does not make a site conformant, and no tool issues that verdict.

How When somebody asks whether the site conforms, answer with what was tested, what was found, what was fixed and what remains open. That is an answer you can support.

Pass No document your organisation publishes claims conformance on the strength of a finished list.

WCAG — · Automated? No

☐ F6 Do not read a clean scan as a clean site

Why A clean automated scan is not a conformant site.

How When a scan comes back with nothing, treat it as a statement about the test rather than about the site, and go and do B1, B3 and B9 by hand.

Pass A clean scan result is recorded with the sentence that qualifies it, wherever it is reported.

WCAG — · Automated? No