

Navigating M-23-22 and Accessibility

An Essential 6-Step Checklist to Get Started

The OMB's memorandum M-23-22 prompted federal agencies to enhance online accessibility, yet many face staffing and funding limitations in meeting the memo's requirements. To aid agencies in addressing these challenges, we have created a practical checklist to guide their accessibility journey. The checklist is designed to prioritize high-impact, low-effort actions and is structured to accommodate individuals with varying technical expertise, offering a progressive approach from basic to advanced tasks, and maximizing limited time and resources.



Step 1: Provide a public feedback mechanism

Ensure the public has a way to contact someone with an accessibility concern about your website. (See [Vote.gov](https://www.vote.gov) for an example.) [Section508.gov](https://www.section508.gov) offers clear guidance on what to include.

- Designate a contact person(s) who will address accessibility concerns in a timely manner.
- Ensure there is a custom 508 or accessibility email link or form.
- Date the statement so the public knows how often the page updates.

Who might this involve? Legal and/or human resources; some tech input.

Step 2: Design accessible experiences

Discover more about your visitors. As your audience members age, they may acquire disabilities they didn't have before. Your understanding of their needs will help you meet them where they are.

- Include people with disabilities in your user personas.
- Gather data on how people access your site and know that a minimum of 15–25% are disabled.

Who might this involve? Usability research team, content team, and/or search engine optimization (SEO) analysts.

Step 3: Expand your usability research to include people with disabilities

We realize not every team has a usability researcher, just like many don't have a 508 specialist. However, you can still take stock of your current site and find out what is causing the most friction. Do you get the same questions frequently? Barriers that obstruct a non-disabled person from accessing resources are going to be even more problematic for people with disabilities.

- Identify your agency's "top tasks." What do people come to your site for?
- Review the [Digital.gov User Experience resource page](#).
- Use your feedback mechanism (see Step 1) to gain insight into what people are telling you needs to be fixed.

Who might this involve? User experience research (UXR) team and/or legal.

Great user experience research resources:

- [18F User Experience Guide](#)
- [Research at VA guides and templates](#)

Step 4: Evaluate your CMS platform for compliance

Many teams use a content management system (CMS) to quickly update their website. But did you know the CMS must also be accessible? And even with an accessible CMS and accessible site code, your site editors can inadvertently create 508 violations by adding content incorrectly. Before more inaccessible content is added, it's best to provide training then move on to the next step.

- Check to ensure that your CMS procurement follows [federal procurement laws](#).
- Do your content editors know how to create accessible content? If you're unsure, survey their knowledge or add this topic to an upcoming meeting.
- Share resources such as [Accessibility for Content Designers](#) from Digital.gov.

Who might this involve? Procurement, content, and those with authoring permissions.

Step 5: Get a baseline to establish where your site is starting with accessibility

Begin by having a clear picture of where your site does or doesn't comply with Section 508. This step does include some technical know-how.

- Identify your top ten visited pages or your top ten downloads (if you have any) and conduct a quick audit. Run that content through automated tools to get a composite score.
- Identify issues and categorize them. Some issues can be fixed by content editors, but others may need to be fixed by a developer or a designer.

Who might this involve? Content, design, developers, quality assurance (QA), and/or SEO analysts.

Free tool options include page-by-page checkers. We recommend [ANDI](#), [WAVE](#), or [Lighthouse](#).

Step 6: Conduct a manual accessibility audit

If your project is using the US Web Design System ([USWDS](#)), that's a great start, since it's mentioned in the OMB memo, but ensure you are performing manual accessibility audits of your site. This step needs some level of Web Content Accessibility Guidelines (WCAG) understanding, but not all accessibility testing requires a developer.

- See [USWDS component checklists](#) for proper usage guidance and tips on how to conduct manual audits with little to no technical experience needed.

Who might this involve? Designer, developer, content owner, QA team.