WCAG 2.1 EDITION · BASED ON VPAT® 2.5

Accessibility Conformance Report: English Unlocked curriculum PDFs

How the English Unlocked PDF documents meet the Web Content Accessibility Guidelines (WCAG) 2.1, Levels A and AA, criterion by criterion. Based on VPAT® Version 2.5.

Report details

Name of product and version	English Unlocked, version 1: accessible PDF files (October 2026 edition)
Report date	October 26, 2026 (revised October 28, 2026)
Product description	English Unlocked is Literacy Minnesota's adult ESL curriculum, sold at englishunlocked.literacymn.org. This report covers its 119 distinct PDF documents (6,592 pages): student pages and teacher pages (with answer keys) for the Beginning Literacy, Beginning, Intermediate and Advanced levels, the level unit lists and guiding documents, Phonics Workbooks 1 to 5, and the free samples. The Full Curriculum repeats the level documents (for 10 of them it holds a slightly different version, counted among the 119), so the store holds 238 files (12,048 pages) in all. The free previews linked from the store come from these same files: four are complete teacher-pages documents and five are page excerpts from the phonics teacher instructions.
Contact information	Accessibility questions: englishunlocked@literacymn.org
Notes	Scope: the PDF files only. The store website and its in-browser reader are not covered. To use the files with a screen reader, download the PDF and open it in a PDF reader that supports tagged PDF. Fill-in lines on worksheets are announced as "blank", and the answers that teacher answer keys mark with a highlight are announced as "correct answer". This report does not claim that the curriculum files fully conform to WCAG 2.1 Level AA, or that they conform to PDF/UA (ISO 14289-1).

Evaluation methods used	The documents were remediated by a scripted process: automatic tagging, then scripted repairs to the tag structure, text alternatives for pictures, announcements for fill-in lines and answer-key highlights, and bookmarks. Fourteen rounds of separate verification reviews (September 25 to October 6, 2026), run by the developer, checked the result, and reflow was tested in Adobe Acrobat on October 26, 2026. They inspected the tag structure and reading order of every page with scripted checks, compared the pages with the original files, checked samples by eye, and ran veraPDF with its PDF/UA-1 profile on every document. The reviews used automated tools and AI-assisted reviewers. Early versions were spot-checked with the NVDA screen reader during remediation. The final files have not yet been tested systematically with screen readers or by people with disabilities; what assistive technology announces in them was inferred from the tag structure.

Applicable standards and guidelines

Standards covered by this report

Standard or guideline	Included in report
Web Content Accessibility Guidelines 2.1	Level A: yes. Level AA: yes. Level AAA: no.
Web Content Accessibility Guidelines 2.0	Covered by the WCAG 2.1 Level A and AA tables (every 2.0 criterion is part of 2.1).
Web Content Accessibility Guidelines 2.2	Level A: no. Level AA: no. Level AAA: no.

The U.S. Department of Justice rule for ADA Title II (2024) uses WCAG 2.1 Level AA as its technical standard. WCAG is applied to the PDFs as non-web documents, following the W3C's guidance on applying WCAG to non-web documents (WCAG2ICT). WCAG2ICT reads 2.4.5, 3.2.3 and 3.2.4 as applying to sets of documents; the remarks below describe both the set and each document.

Terms

Supports

The documents meet the criterion without known defects.

Partially Supports

Some content does not meet the criterion. The remarks give the scale.

Not Applicable

The criterion does not apply to these documents.

Does Not Support

Most content does not meet the criterion. Not used in this report.

Not Evaluated

The criterion was not evaluated. Used only for Level AAA.

Under each conformance level, a note gives the basis. *Verified*: checked in the separate review rounds. *Checked for this report*: measured or scanned while preparing this report. *Follows from the content*: the documents have no feature the criterion applies to.

Summary

The documents support or partially support every applicable WCAG 2.1 Level A and AA criterion. No criterion is marked Does Not Support. Eight are Partially Supported: gaps in reading order and in announcements on worksheets and answer keys, instructions that rely on formatting, the answer-key highlight (the only visual mark of the correct option, and low in contrast), one picture of text, the fixed page layout (reflow), and the publisher's decision to keep the level colours. Each is documented below with its scale.

Determinations by level

Level	Supports	Partially Supports	Does Not Support	Not Applicable	Criteria
Level A	13	4	0	13	30
Level AA	8	4	0	8	20

Table 1: Success criteria, Level A

WCAG 2.1 Level A

Criteria	Conformance level	Remarks and explanations

1.1.1 **Non-text Content**	**Supports** Verified	4,390 informative pictures have text alternatives. Decorative graphics are marked as artifacts, and second drawings of a picture already described are not announced. The 7 phonics page thumbnails are described and list the words printed in the card they show.
1.2.1 **Audio-only and Video-only (Prerecorded)**	**Not Applicable** Follows from the content	The documents contain no audio or video.
1.2.2 **Captions (Prerecorded)**	**Not Applicable** Follows from the content	No audio or video.
1.2.3 **Audio Description or Media Alternative (Prerecorded)**	**Not Applicable** Follows from the content	No audio or video.
1.3.1 **Info and Relationships**	**Partially Supports** Verified	All documents are tagged: headings, paragraphs, lists, tables, pictures and links. 10,696 places to write are announced as "blank". Answer keys make 2,794 "correct answer" announcements. • About 700 answer lines are not announced, and 695 runs of underscores inside text are read as underscores. • On answer keys, about 160 highlighted written answers are read without the "correct answer" marker, 230 highlights are not announced, and 1 open line is announced under an answered item (Intermediate, College Choices, teacher page 46). • 764 layout grids are tagged as tables without header cells, and 4 tables have uneven rows or columns (Beginning Literacy, Making Plans with Friends, student page 37 and teacher page 74; Beginning Literacy, Daily Activities, student page 39; Phonics Workbook 1, student page 9). Details: fill-in lines, answer keys, tables and picture exercises.

1.3.2 **Meaningful Sequence**	**Partially Supports** Verified	The reading order follows the printed order for most content. • Around fill-in lines, about 140 blanks and about 120 sentence-final marks are read out of print order. • 130 of 7,003 teacher-note sections are read under the wrong label, and 115 answers written in place are read out of print order. • On 68 of 330 picture-exercise pages, all the words are read before all the pictures. Details: reading order.
1.3.3 **Sensory Characteristics**	**Partially Supports** Checked for this report (text scan)	Most instructions that mention a position also name the item, as in "the vocabulary box at the bottom of the page". Some depend on formatting or position alone: • Teacher notes that refer to bold words, for example "Have students point to bold text" (36 mentions in 13 teacher books). • Some instructions refer to underlined words without naming them, for example "Talk about the meaning of each underlined word". • "the sentences on the left" and "on the right" (Advanced, Brains and Learning). Details: formatting and position.
1.4.1 **Use of Color**	**Partially Supports** Checked for this report	On teacher answer keys, a yellow highlight (about 1.3:1 against white) is the only visual mark of the correct option. Screen readers hear "correct answer" before every highlighted option letter and TRUE/FALSE answer; the two remaining highlight shapes are second shapes on answers already announced. Details: answer keys.
1.4.2 **Audio Control**	**Not Applicable** Follows from the content	No audio.
2.1.1 **Keyboard**	**Supports** Verified	The only interactive items are 36 links, all tagged and in the tab order. The PDF reader provides keyboard operation.
2.1.2 **No Keyboard Trap**	**Supports** Follows from the content	No item can trap keyboard focus.

2.1.4 **Character Key Shortcuts**	**Not Applicable** Follows from the content	The documents define no keyboard shortcuts.
2.2.1 **Timing Adjustable**	**Not Applicable** Follows from the content	No time limits.
2.2.2 **Pause, Stop, Hide**	**Not Applicable** Follows from the content	No moving, blinking or updating content.
2.3.1 **Three Flashes or Below Threshold**	**Supports** Follows from the content	No flashing content.
2.4.1 **Bypass Blocks**	**Supports** Verified	Every document has bookmarks (7,979 in 119 of 119 documents) and tagged headings. Running page headers and footers are marked as artifacts, so they are not read on every page.
2.4.2 **Page Titled**	**Supports** Verified	All 119 documents have a title, and readers show it in the title bar. Titles follow the file names and level codes (b is Beginning, bl Beginning Literacy, int Intermediate, a Advanced), for example "English Unlocked: b daily activities teacher pages". One title keeps a misspelling from its file name ("a college expections teacher pages").
2.4.3 **Focus Order**	**Supports** Verified	The only focusable items are the 36 links. Every page sets the tab order to the structure order, so links are reached in reading order.
2.4.4 **Link Purpose (In Context)**	**Supports** Verified	All 36 links are tagged, in reading order, and named by their visible text: the 24 "literacymn.org" links at the foot of the unit-list pages carry that text as their description, and the Curriculum Level Chart link reads its whole visible title.
2.5.1 **Pointer Gestures**	**Not Applicable** Follows from the content	No gestures.
2.5.2 **Pointer Cancellation**	**Not Applicable** Follows from the content	Links are activated by the PDF reader. The documents add no pointer events.

2.5.3 **Label in Name**	**Supports** Verified	The accessible name of every link contains its visible text (36 of 36). The Curriculum Level Chart link reads "Test Benchmarks for NRS Educational Functioning Levels (EFL) (updated August 2023)", and the unit-list links read "literacymn.org".
2.5.4 **Motion Actuation**	**Not Applicable** Follows from the content	No motion input.
3.1.1 **Language of Page**	**Supports** Verified	The document language is set to English (en or en-US) in all 119 documents.
3.2.1 **On Focus**	**Supports** Follows from the content	Moving focus to a link does not change the context.
3.2.2 **On Input**	**Not Applicable** Verified	The documents have no form fields. Fill-in lines are for writing on a printed copy (see 1.3.1).
3.3.1 **Error Identification**	**Not Applicable** Verified	No form fields or other input.
3.3.2 **Labels or Instructions**	**Not Applicable** Verified	No form fields or other input.
4.1.1 **Parsing**	**Supports** Verified	The tag structure is well formed in all 119 documents: every tagged item is referenced once, no reference points to missing content, and the structure's index of pages is correct. WCAG 2.2 removes this criterion.
4.1.2 **Name, Role, Value**	**Supports** Verified	All 36 link annotations are tagged as Link elements with object references. The documents have no form fields or other controls.

Table 2: Success criteria, Level AA

WCAG 2.1 Level AA		
Criteria	**Conformance level**	**Remarks and explanations**
1.2.4 **Captions (Live)**	**Not Applicable** Follows from the content	No audio or video.
1.2.5 **Audio Description (Prerecorded)**	**Not Applicable** Follows from the content	No video.
1.3.4 **Orientation**	**Supports** Follows from the content	The documents do not lock the display orientation. The unit lists have landscape pages by design.
1.3.5 **Identify Input Purpose**	**Not Applicable** Verified	No form fields.
1.4.3 **Contrast (Minimum)**	**Partially Supports** Verified	Body text is dark on white. By publisher decision, each level keeps its colour, and text in these colours is below 4.5:1: • Beginning red, 3.32:1: 15,261 words on 1,555 pages • Advanced mustard, 2.11:1: 12,738 words on 1,203 pages • Intermediate green, 2.27:1: 12,142 words on 1,194 pages • Beginning Literacy blue, 3.65:1: 4,575 words on 660 pages • Also grey text, 3.85:1 (160 words on 29 pages), and phonics trace letters for handwriting practice, 1.86:1
1.4.4 **Resize Text**	**Supports** Follows from the content	Text is real text (see 1.4.5 for one exception). It scales with the reader's zoom without loss of content.
1.4.5 **Images of Text**	**Partially Supports** Verified	Text in photographs of real objects (price tags, coins, signs, size labels) is part of the picture, and its text alternative quotes it. One schedule is a picture of text: Beginning Literacy, Talking at Work, student page 42. Its text alternative lists all seven days.

1.4.10 **Reflow**	**Partially Supports** Checked for this report	The documents are fixed-layout pages. In Adobe Acrobat's Reflow view at phone width (tested on 11 sample pages in 6 documents; in Acrobat 26, Reflow is available only in the classic interface), text pages such as instructions, teacher notes and the FAQ wrap into one column without horizontal scrolling. • Reflow shows text in the order it was drawn, not the tagged reading order screen readers use. On teacher-note pages the section labels appear together at the end of the page, and on dialogue pages the questions and the answers are grouped. • Large titles can break inside a word, and labels printed on photos can overlap. • Data tables and pictures are exempt from reflow. Pages built around them, such as worksheets with lines to write on, tables and picture grids, do not reflow usefully and are best used at their printed layout or with a screen reader: at least 1,630 of 6,592 pages by the tag structure. 2,848 pages have at least one table or fill-in line.
1.4.11 **Non-text Contrast**	**Partially Supports** Checked for this report	Measured: the yellow answer-key highlight is about 1.3:1 against white. On teacher keys it is the only visual mark of which option is correct; screen readers announce "correct answer". Graphics in the level colours follow the publisher's colour decision (see 1.4.3). Fill-in lines and table borders were not measured.
1.4.12 **Text Spacing**	**Not Applicable** Follows from the content	The criterion applies to content in markup languages that let users override text spacing. PDF is not one.
1.4.13 **Content on Hover or Focus**	**Not Applicable** Follows from the content	No content appears on hover or focus.
2.4.5 **Multiple Ways**	**Supports** Verified	Bookmarks (7,979 items in 119 of 119 documents, generated from the heading structure where the original had none) and tagged headings.

2.4.6 **Headings and Labels**	**Supports** Verified	Headings describe their sections. Every page has at most one first-level heading, and every document has bookmarks built from its headings. Vocabulary-card words are paragraphs, not headings or bookmarks. Ten picture-card pages of one Beginning Literacy teacher book carry their numbered label ("2. mechanic") as the page heading. Fourteen flashcard sheets of the Beginning Literacy teacher books (3 to 5 boxed words under a running head) have no heading or bookmark of their own and are read in order after the heading of the appendix they belong to.
2.4.7 **Focus Visible**	**Supports** Follows from the content	The PDF reader shows the focus. The documents do not change it.
3.1.2 **Language of Parts**	**Supports** Verified	The content is in English. No element carries a different language setting.
3.2.3 **Consistent Navigation**	**Supports** Follows from the content	All documents use the same navigation aids, bookmarks and tagged headings, generated the same way.
3.2.4 **Consistent Identification**	**Supports** Verified	The only components are the 36 links, and they are identified the same way in every document: tagged as links and named by their visible text.
3.3.3 **Error Suggestion**	**Not Applicable** Verified	No form fields or other input.
3.3.4 **Error Prevention (Legal, Financial, Data)**	**Not Applicable** Verified	No form fields or other input.
4.1.3 **Status Messages**	**Not Applicable** Follows from the content	No status messages.

Table 3: Success criteria, Level AAA

Not evaluated.

Documented exceptions

Full scale of each Partially Supported criterion as of the October 2026 files. The counts come from the final verification review (round 14; the answer-key announcement counts were set in round 12 and did not change after it). The 1.3.3 text scan, the 1.3:1 highlight measurement (1.4.1, 1.4.11) and the reflow test (1.4.10) were done for this report. Examples name the level, the unit and the page.

Fill-in lines (1.3.1)

- 10,696 places to write (drawn lines and underscore blanks) are announced as "blank".
- Not announced: 695 runs of underscores inside longer text (read as underscores); writing cells in some tables (the Letter Sounds tables and the Beginning Literacy letter tables, 24 cells in Phonics Workbook 5, Beginning Medicine Labels student page 13, and the writing lines of the "What? / When?" sorting tables); and about 700 answer lines, mostly long lines that stand alone or lines in student books with a word beside them.
- Wrong announcements are rare. Random samples of newly announced lines (30 in one review round, 20 in a later one) had no false ones.

Answer keys (1.3.1, 1.4.1)

- On teacher keys, a yellow highlight (about 1.3:1 against white) is the only visual mark of the correct option (1.4.1, 1.4.11).
- 2,794 "correct answer" announcements in 39 teacher books. Where the highlight draws the answer itself, the answer is read with the marker.
- Every highlighted option letter and TRUE/FALSE answer is announced. The two remaining highlight shapes are second shapes on answers already announced.
- About 160 highlighted written answers are read as plain text without the marker. These are mostly answer sentences on Intermediate and Advanced keys, and the letters on the Letter Sounds keys of Beginning Home Problems and Health Problems. 230 highlights on key pages are not announced.
- Key lines that carry or sit next to a printed answer are not announced as "blank". One open second line under an answered item is announced: Intermediate, College Choices, teacher page 46.
- On Beginning "Reading Test Practice" answer keys, answer boxes read their letters apart from the item numbers (about 25 lines).
- 2 highlighted examples and 2 notes are announced as "correct answer" although they are not answers.
- Open writing lines under an "Answers vary" note are announced as "blank". Lines that carry the key's own answer or note are not.

Instructions that rely on formatting or position (1.3.3)

- Teacher notes that refer to bold words, for example "Have students point to bold text" (36 mentions in 13 teacher books).
- Some instructions refer to underlined words without naming them, for example "Talk about the meaning of each underlined word".
- "the sentences on the left" and "on the right" (Advanced, Brains and Learning).

Reading order (1.3.2)

- 55 blanks are read before text printed above their line. 9 lines are read inside running text, for example "Some kinds blank of AT" on Advanced, Assistive Technology, student page 8.
- 71 blanks are read apart from the words printed right after their line. Those words are read later, often after the whole exercise. One example is Advanced, College Expectations, student page 37.
- 4 blanks are read after the closing mark printed right after their line, and 1 board-text line is read before its question mark.
- About 120 sentence-final marks printed right after a blank's line are read away from it or not at all.
- 130 of 7,003 teacher-note sections (643 items, on 105 pages) are read under the wrong label.
- 115 answers written in place are read out of print order. On some keys, answers are read before or after the sentences they complete.

Tables and picture exercises (1.3.1, 1.3.2)

- 764 layout grids are tagged as tables without header cells, and 4 tables have uneven rows or columns (Beginning Literacy, Making Plans with Friends, student page 37 and teacher page 74; Beginning Literacy, Daily Activities, student page 39; Phonics Workbook 1, student page 9).
- On 68 of 330 picture-exercise pages, all the words are read before all the pictures ("Read New Words": 34 of 48 pages).

Pictures, contrast, links and headings

- Pictures (1.1.1): every informative picture is described, including the 7 phonics page thumbnails; no exception. Pictures of text (1.4.5): see Table 2.
- Contrast (1.4.3, 1.4.11): the level colours are kept by publisher decision; see Table 2 for the ratios and word counts.
- Reflow (1.4.10): text pages reflow, in drawing order rather than the tagged reading order; worksheets, tables and picture grids (at least 1,630 of 6,592 pages) depend on their printed layout. See Table 2.
- Links (2.4.4, 2.5.3): all 36 links are named by their visible text; no exception.
- Headings (2.4.6): no page has more than one first-level heading and no vocabulary-card word is a heading; 14 flashcard sheets and 10 picture-card pages are described in Table 2.

How the files were checked

- The remediation did not change how the pages look or the text they contain. This was checked page by page against the original files, and between rounds.
- The tag structure is sound. Every tagged item is referenced once, with no dangling references, in all 119 documents. In the last three review rounds, the process was run again 12 times from a saved earlier stage and matched the delivered files, and 32 repeat runs on finished files changed nothing.
- On veraPDF, PDF/UA-1 profile, 6 of 119 documents pass in full. Of the 8,070 remaining failed checks, 7,973 are font rules, such as bullet characters from a symbol font and a font used only to draw spaces. The other 97 are structure rules that relate to 1.3.1: 92 concern lists that hold other elements than the standard list parts, and 5 concern the 4 tables with uneven rows or columns listed above. PDF/UA conformance is not claimed.

- Reflow was tested in Adobe Acrobat's Reflow view at phone width on 11 sample pages from 6 documents, and the tag structure of all 6,592 pages was checked for layout that does not reflow.
- The free previews on the store come from the remediated files: four are complete copies and five are page excerpts, each with its own title. They were made on October 26, 2026 without changing the pages or their tags (only the phonics cover photos were stored at a lower resolution), and checked page by page against the full files.
- Early versions were spot-checked with the NVDA screen reader. Not yet done: systematic testing of the final files with screen readers, and testing by people who use assistive technology.

Legal disclaimer

This report describes the accessibility of the English Unlocked PDF documents (October 2026 edition) as evaluated on the date shown, using the methods described under "How the files were checked." It is provided for information only. It is not a warranty or guarantee of conformance and does not create any contractual obligation. Results may differ with other PDF readers, assistive technologies or settings. Literacy Minnesota may update the documents and this report without notice. Questions about this report, or requests for help using the materials, can be sent to englishunlocked@literacymn.org.

Based on VPAT® Version 2.5 (WCAG edition). VPAT® is a registered service mark of the Information Technology Industry Council (ITI).

Prepared from the round-11 to round-14 verification reviews of the English Unlocked accessible files (October 3 to 6, 2026) and the reflow test of October 26, 2026.