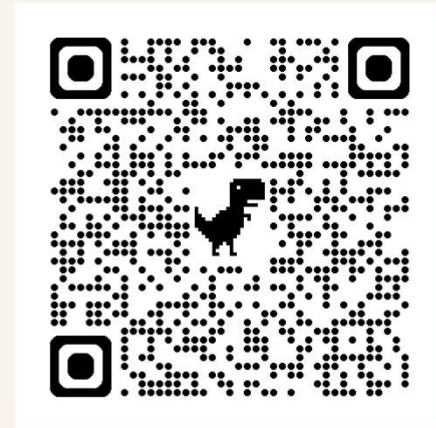


Staying **Nimble** in Uncertain Times

Responding to Tariff and Accessibility **Changes** for Chinese Collections




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Overview of U.S. Tariffs & ADA Title II Digital Compliance

Trump Tariff Timeline - 2025

- **February 4, 2025:** 10% additional tariff on all Chinese imports announced.
- **February 2025:** 25% import tax announced for Canada and Mexico regarding fentanyl flow.
- **April 2, 2025 ("Liberation Day"):** EO 14257 enacted, applying a 10% base "reciprocal" tariff on most goods, with 34%+ duties on Chinese goods.
- **April 9-10, 2025:** China tariffs escalated to 125%-145%.
- **May 12, 2025:** U.S.-China IEEPA tariffs reduced to 10%.
- **June 5, 2025:** Trade talks resume with China.
- **July 10, 2025:** Intention announced to raise baseline reciprocal tariff rate to 15-20%.
- **July/August 2025:** 25% tariff imposed on Indian goods; 90-day truce with China extended.
- **August 29, 2025:** *De minimis* exemption suspended for most shipments.
- **September 30, 2025:** 10% tariff on timber/lumber; 25% on furniture.
- **Nov/Dec 2025:** Tariffs on EU, UK, and others formalized with 15% rate common.  C.H. Robinson +7

Key 2026 Update

- **February 20, 2026:** The U.S. Supreme Court ruled that tariffs imposed under the International Emergency Economic Powers Act (IEEPA) were unconstitutional, reversing the 125% tariffs on China and other 2025 IEEPA actions. Non-IEEPA tariffs remain in place.  Tax Policy Center

Key Aspects of Title II Digital Compliance

- **Applicability:** Covers all web content, mobile apps, and digital services provided by state and local governments, including public universities and community colleges.
- **Technical Standard:** Content must conform to [Web Content Accessibility Guidelines \(WCAG\) 2.1 Level AA](#).
- **Scope of Content:** Includes websites, mobile applications, PDF documents, videos, audio recordings, social media posts, and online learning platforms.
- **Key Deadlines:**
 - **April 24, 2026:** Entities with 50,000+ population.
 - **April 26, 2027:** Entities with fewer than 50,000 population.

Exemptions & Exceptions

Tariff Exemptions

- Printed books, brochures, leaflets and similar printed matter in single sheets
- Printed dictionaries and encyclopedias and serial installments thereof

ADA Title II Exceptions

- Undue burden
- Third-party content / lack of direct control
- Best meets / no fully accessible alternative
- Fundamental alteration

Archived web content; Preexisting conventional electronic documents; Preexisting social media posts, etc.



Different Logics, Shared Uncertainty

Tariff Exemptions (Economic Relief)

- Often categorical or product-based
- May exclude library materials or scholarly imports
- Subject to sudden revision or reversal
- Reduce cost pressure but do not stabilize planning

ADA Title II Exceptions (Compliance Flexibility)

- Case-specific, not blanket exemptions
- Commonly involve undue burden and third-party control
- Require documentation, alternative access, and reassessment
- Allow access to continue but increase operational workload

What They Have in Common:

- Both are externally determined
- Both provide partial relief, not certainty
- Both require libraries to plan under conditions of limited control

Chinese Collection Development as an Adaptive Ecosystem



Adaptive Strategies under External Constraints

Strategy

Tariff Volatility

ADA Title II Accessibility

Scenario Planning

Model acquisitions assuming exemption, delay, or sudden cost increase for Chinese-language materials

Plan for partial accessibility, remediation requests, or alternative access for Chinese databases

Portfolio Diversification

Balance vendors, regions, and formats to reduce exposure to pricing shocks

Combine large platforms with smaller or open-access Chinese resources

Documented Good-Faith Practice

Record pricing shifts and selection tradeoffs tied to external policy changes

Maintain VPAT requests, accessibility reviews, and alternative access pathways

Collaborative Leverage

Coordinate purchasing and timing through consortia or partnership

Share accessibility assessments and mitigation strategies across institutions

Core Principles for Managing External Uncertainty

- Preparedness over prediction
 - Planning for multiple scenarios rather than relying on policy stability
- Documentation as infrastructure
 - Treating records, rationales, and reviews as part of access work
- Equity as an operational commitment
 - Evaluating who bears the impact when access becomes costly or constrained
- Adaptation through partnership
 - Leveraging peer networks and vendor relationships when local control is limited
- Reassessment as a norm
 - Viewing policies, subscriptions, and workflows as revisitable, not fixed



Three Short Takeaways:

- Uncertainty is the baseline.
- Agility is a skill, not a reaction.
- Collective approaches matter.

Thank You!

