



# Association of Professional GENEALOGISTS

19 February 2026

Gale A. Brewer, Chair  
NYC Council Committee on Governmental Operations, State & Federal Legislation  
City Hall, New York, NY 10007

Re: Opposition to Int. 0087-2026 (Consolidation of Archives Oversight Boards)

Dear Chair Brewer and Members of the Committee:

**The Association of Professional Genealogists (APG) strongly opposes [Int. 0087-2026](#). This legislation must be amended to codify the archives board's independence** from the Department of Records and Information Services (DORIS). The current proposal, instead, eviscerates the board's oversight abilities by vesting all power with the Commissioner of the agency itself.

APG is a not-for-profit 501(c)(6) professional organization dedicated to the growth and enhancement of the genealogical profession. Founded in 1979, APG is the world's largest association for professional genealogists, representing more than 2,000 members across forty countries. Our members' work and our clients' understanding of New York City's history depends on reliable stewardship of public records and consistent enforceable access to them.

Currently, two boards, the Archival Review Board (ARB) and the Archives, Reference, and Research Advisory Board (ARRAB) exist to oversee the Archives, and by extension, the Department of Records and Information Services (DORIS). ARRAB, as the name makes clear, is an advisory body, while ARB is a true oversight body that operates independently from DORIS. While it is understandable that the Council seeks to consolidate them, a consolidated board must resemble the ARB, not the ARRAB, or else legitimate oversight will be effectively eliminated, destroying accountability.

Int. 0087-2026 is styled as a housekeeping matter; this is misleading. While the bill summary states that the new board "would complete the same functions previously assigned" to the current boards, this is inaccurate. The agency Commissioner *is* the Ex Officio Chair of ARB under its current framework, but that role is only ministerial. ARB's core powers, currently codified in the [City Charter Section 3005](#), state that:

The board shall meet once every 90 days or upon the request of any of its members. Any member of such board shall have complete access, during work hours, to inspect and review any appraisal, organization, processing or archiving of city records...

The newly proposed legislation adds a trojan horse, stating that members of the board may only gain this access with the concurrence of the chair. In other words, the board

can conduct oversight only if DORIS agrees to let them conduct oversight. No serious oversight structure is designed this way. If approved, Int. 0087-2026 will create an autonomous department that can operate with impunity against the public interest.

Members of the ARB have considerable power. This was not done accidentally. In 2002, the [Council held hearings](#) after DORIS approved an “11th-hour” arrangement under which a newly formed private organization, the Rudolph W. Giuliani Center for Urban Affairs, took custody of the original set of Giuliani administration records. It raised questions about public ownership, professional standards, and whether access decisions could be influenced by the very officials whose records were at issue. In response to this scandal, the Council opted to protect the “priceless and unique” records on which the public relies and created the very same board (the ARB) that it now seeks to disempower.

[In testimony](#) supporting the Council’s push for safeguards in 2002, The Society of American Archivists (SAA) agreed that when a public official bypasses the archives, it sends the message that public records can be treated as private property, and that it “effectively removes” official actions from scrutiny. SAA also drew a direct line to a broader democratic danger, warning that institutions associated with freedom of information must be strengthened, not weakened. That warning is precisely on point here.

By transferring the ARB’s core powers to DORIS itself, we will be turning the clock back decades. In fact, the new board is to be called the Library and Archival Review *Advisory* Board, making it abundantly clear that the intention of this change is to give the board no actual authority. APG urges the Council to preserve real independence. **At a minimum, a “concurrence of the chair” requirement for inspection and review must be stricken.** The legislation should *remove* the Commissioner as chair; the board should elect its own chair. APG asks the Committee to reject Int. 0087-2026, or amend it so that the oversight board is empowered to oversee DORIS—not be managed by it.

Respectfully,



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