Introduction
The Task Group on Accessibility Information in Provider Neutral Records is tasked to
clarify the relationship between the provider-neutral (P-N) record guidelines and accessibility features of online resources, and to consider whether the Provider-Neutral E-Resource MARC Record Guide should be modified to accommodate recording accessibility features. The Task Group was asked to take into account “end user discovery, as well as the benefits offered by the provider-neutral standard for reducing duplication of work and streamlining long results sets for both catalogers and end users.”

According to the PCC's Provider-Neutral E-Resource MARC Record Guide (P-N/RDA version), “The provider-neutral (P-N) model uses a single bibliographic record to describe multiple online manifestations of a resource, regardless of which publisher or aggregator is making the content available. The description should apply only to equivalent manifestations of the same expression; substantial (not just incidental) differences may indicate a different expression, which should be described in a separate record.”

While the provider-neutral (P-N) guidelines includes a section on recording accessibility features for streaming media (i.e., ones that are “substantial” enough to indicate a different expression such as closed captioning, etc.), it does not explicitly address other types of accessibility information that may potentially be recorded in P-N records. Beginning with the ones identified by the SCS in our charge, the Task Group will explore additional features and make recommendations on how to address them in the guidelines. Also per our charge, the Task Group will study and recommend how to record such information, including the use of specific MARC fields (e.g.,341, 532 fields) that are not included in the current guidelines.

Finally, the Task Group will investigate whether to recommend the current practice of creating and maintaining separate P-N records for specific online versions of a resource that have substantial differences in accessibility content. As the original provider-neutral guidelines (written for AACR2) stated, the “creation of one record that can be used for as many aggregations as possible improves search and retrieval in online catalogs” (p. 12). The Task Force will explore whether this objective is effectively met when multiple P-N records are created for separate versions of a resource with different accessibility features, or whether it would be better achieved by maintaining a single P-N record that includes information about multiple accessibility features that appear on separate platforms, and do not apply to all versions of a resource.

**Evaluation**

The Task Group began by examining the nature of accessibility features. We shared knowledge about accessibility in electronic text formats, video and audio accessibility features, and provisions in the MARC21 standard for recording accessibility information. We collected some information on vocabularies available to describe accessibility
features. We briefly examined legal liability issues for providing materials which are not accessible. Much of our discussion has circled around the great need for accessibility information in bibliographic records, and what kinds of information might be desired.

The Provider-Neutral Guidelines specify that, “Notes about access restrictions, file formats, file sizes, prices, subscription information, or system requirements specific to particular providers are not used.” However, accessibility features that might vary from provider to provider are specifically called out for streaming media: “a streaming video with English captions and one without are considered different expressions and should not be brought together on the same provider-neutral record.” Though this guideline was originally written for AACR2, it is supported in both original RDA and in the LRM model which is the foundation for official RDA. Under LRM, accessibility content constitutes a Work in itself, and a resource with accessibility content is an “augmentation aggregate”, an aggregate of a primary Work plus a supplementary accessibility content Work to augment the primary. The same title with different accessibility content, or lacking accessibility content, is technically a separate Work and Expression, requiring a separate bibliographic record. The nature of aggregate Expressions is contrary to the expectations of many librarians and one of the most common causes of consternation with official RDA.

The Task Group determined that provider-neutral records could be produced without violating the spirit of the P-N Guidelines as long as every instance of the resource linked to the record provided the same accessibility features. Thus a title might have a P-N record for platforms with feature A, another P-N record for platforms with feature B, a third P-N record for platforms with features A and B, etc. Since the P-N records would not indicate which vendors provide which named features, selecting the correct P-N record would require identifying the features available from the specific provider and checking the records, which would take even more work than simply selecting a provider-specific record. The extra work and the addition of multiple P-N records diminishes the usefulness of the Provider-Neutral Guidelines.

The Task Group spent some time reviewing common workflows for importing bibliographic records into local library systems, especially in batches. For batch work, which sometimes imports thousands of records at a time, it is impractical to examine every bibliographic record individually. The purpose of batch work is to reduce or eliminate the need to work on individual records. Local libraries cannot afford to add and maintain accessibility information solely within their own catalogs. It is best if the information is added to the records by the vendor or collectively by the community in a shared service such as OCLC.

OCLC’s Collection Manager is an example of a distribution system for record sets for entire vendor collections. Some vendors provide their own records directly to libraries, which may or may not include accessibility information and are usually not provider-
neutral. OCLC, however, generally promotes provider-neutral records. Vendors send collection information to OCLC and an algorithm matches the information to the WorldCat database to generate sets of MARC records detailing the vendor collection, for distribution to subscribing libraries. This poses a problem regarding accessibility information. The information from the vendors does not include details about the accessibility of titles. Record matches are based on the provided vendor information. If there are multiple similar records, the algorithm could match the title to a record that does not fit some of the missing details, such as accessibility information. With the vast numbers of records managed by Collection Manager, such mismatches will be discovered and corrected only if someone notices and specifically changes the match in Collection Manager, or if the data on which the match is based is improved in the bibliographic record or in the data file provided by the vendor.

When a library creates a separate bibliographic record in WorldCat for a work or expression only differs in accessibility content, there are always concerns that the record with accessibility content might be matched and then merged to the record describing the work or expression without accessibility content. A library would need to “catalog defensively” by recording fields which mark the record as distinct from similar records to avoid automated merging. This is a serious problem faced by services which create accessible content to augment existing resources.

We also discussed the dilemma faced by libraries using a shared catalog, such as WorldCat Discovery or consortial catalogs. Member libraries often have little control over which record is used for common resources. Provider-Neutral records are often preferred in such catalogs for the best use of shared resources. Members may or may not have the ability to augment the records with local information. Even when they can, the appeal of consortial catalog is a shared catalog that requires less maintenance by individual libraries.

PCC requires the Provider-Neutral Guidelines for records in OCLC marked as ‘PCC’. OCLC’s “When to Input a New Record” states (under the 533 field), “Online resources, print-on-demand resources, and photocopy reproduction should be cataloged according to provider-neutral guidelines.” But libraries are free to do whatever they want in their local catalog. Many libraries are probably using P-N records from OCLC without considering whether every instance of the resource linked to the record has the same features. If Library A and Library B use the same P-N record for different platforms with different features, it usually does not matter to those libraries. On the other hand, taking advantage of the convenience of provider-neutral records generally means that they do not get accessibility information in the records. If the library adds accessibility content in local bibliography fields, the accessibility information can only benefit the users of Library A and does not support cooperative cataloging.

Changing the P-N Guidelines would mean consolidating multiple Expressions, or even
multiple augmentation aggregate Works, into a single bibliographic record. This is a significant change from the current understanding that different Expressions go on separate records. It would also have implications for conversion to a linked data environment adhering closely to official RDA. But it would support the two competing desires for the benefits of provider-neutral records and support for libraries and users who need accessibility information.

Preliminary Decision

After consideration of the broad issues, the Task Group is ready to examine possible recommendations. At a recent meeting, a majority favored exploring options for modifying the Provider-Neutral Guidelines to permit a single record for multiple expressions differing only in accessibility information. Based on this, we will begin examining specifics of how this could be implemented and the implications. There are still several issues to consider, and decisions to be made.

The Task Group expects to complete our work by the time our final report is due on April 5, 2024.

Outstanding Questions

There are several remaining questions for the Task Group to consider:

- What information about accessibility should be recorded in P-N records, and how should it be recorded (e.g., in MARC fields 341 and 532)?
- Should information about accessibility or adaptive features of a provider platform (such as automated text-to-speech, auto-captioning, or text resizing functions) be treated differently from resource-specific information about the resource’s content, such as non-machine generated captions or transcripts for streaming video?
- How should the non-static nature of accessibility content and adaptive features be handled? Providers may add or remove features from their platforms. Streaming video providers will often caption previously uncaptioned videos on request. If changes in some accessibility features are determined to require a separate record, how should this be handled in a shared environment where catalogers may not be able to ascertain the available accessibility features for all versions and where libraries may not get updates if records are split?
- Born-accessible ebooks can be formatted by publishers to make them accessible for users of screen-readers and sold directly by the publisher to consumers or to providers. Born-accessible ebooks are not special editions, but the standard edition available to all consumers and providers. The accessibility of the ebook
as issued by the publisher, whether in pdf, epub, or html, remains constant regardless of provider platform, though some platforms may limit user access to certain accessibility features. Since the publisher issued the ebook with accessibility features, could these features be described in provider-neutral records regardless of any limits a platform places on that ebook?