



NATIONAL ENDOWMENT FOR THE HUMANITIES

NEH COMPLIANCE PLAN FOR OMB MEMORANDUM M-25-21 September 2026

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INTRODUCTION

NEH is committed to the safe, secure, responsible, and trustworthy use of AI to accomplish its mission and better serve the American public with excellence, efficiency, and transparency. On August 28, 2025, NEH assigned the duties and title of Chief Artificial Intelligence Officer to the Acting Chief Information Officer. NEH has an AI use policy and procedures, established in December 2025, that provide a framework for driving AI innovation, improving AI governance, and fostering public trust while remaining cognizant of the need for thoughtful use and the potential for risk. By establishing governance for AI adoption, incorporating AI use into risk management procedures, and enhancing the AI capabilities of its workforce, NEH leverages the expertise of its staff members to assess risk and promote effective and responsible AI use.

1. DRIVING AI INNOVATION

Removing Barriers to the Responsible Use of AI

NEH has removed barriers to AI adoption by establishing agency policy and procedures for AI use and investing in AI tools to support its workforce and the agency's grant making processes. The policy and procedures establish governance for reviewing and approving AI use cases, outline requirements to safeguard data and protect privacy, and define how AI tools are aligned with agency risk management processes. With this policy in place, NEH ensures that all AI tools are subject to a defined review process that ensures that technical, data, privacy, and cybersecurity concerns are addressed prior to deployment.

Generative AI is especially promising for supporting administrative functions at NEH. Uses include generating first drafts of documents such as Statements of Work, policies, and procedures; automated transcription and summaries of meetings; generation of standard-format summaries of documents; and data analysis to assist with assessing program effectiveness. The NEH AI use policy enables AI use while establishing guidelines for fact-checking generative AI so it can be used responsibly.

Sharing and Reuse

NEH actively collaborates with other government agencies and, as managing partner of a consortium of agencies using a shared grants management system, is uniquely positioned to share AI solutions within this partnership. Solution sharing is supported through regular meetings of the board that governs this shared system. The grants management system is developed by the NEH Office of Information Technology and is overseen by a defined governance structure with representatives from multiple agency offices and other partner agencies. Hiring and investment in data-skilled resources would further promote the sharing of data assets and reuse of AI solutions.

AI Talent

Development of the agency workforce to support AI innovation requires careful assessment of where technical talent could have the most impact. To date, technical staff members have leveraged training and expert consulting opportunities to develop AI solutions and assess agency readiness for AI adoption. To increase employees' AI skillset, NEH offered its employees specialized training in a variety of AI uses, developed a central AI Knowledge Hub with AI resources, and has incorporated AI in its annual security and privacy training.

2. IMPROVING AI GOVERNANCE

Agency Policies

NEH released its first AI use policy and procedures in December 2025. NEH has also updated its agency security control procedures to ensure that employee AI use is aligned with the agency use policy. The agency's AI policy and procedures are incorporated into the agency's annual security awareness and privacy training for staff members and define acceptable and unacceptable use.

AI Use Case Inventory

NEH staff are encouraged to provide AI use cases to agency leaders. The NEH AI use policy and procedures include instructions for submitting AI use cases and use case descriptions must provide insight into how the AI solution will contribute to the agency's mission and align with security and privacy requirements. Potential use cases are subject to review and governance as described in the AI use policy and procedures. Solutions will be added to the NEH AI Use Case Inventory if they meet the criteria for inclusion pursuant to OMB guidance as determined by the CAIO. NEH will publish its AI Use Case Inventory annually or as directed by OMB.

3. FOSTERING PUBLIC TRUST IN FEDERAL USE OF AI

Determinations of Presumed High Impact AI

AI is high impact when its output serves as a principal basis for decisions or actions that have a legal, material, binding, or significant effect on rights or safety. Due to the higher risk associated with high impact AI, its use requires implementing a set of defined minimum risk management practices.

The CAIO and AI governance structure will review AI use cases and determine whether the case could be high impact based on the criteria defined in M-25-21. At this time, NEH has no plan to implement high impact AI, and agency AI use policy and procedures dictate that if a use case or solution would introduce high impact AI, it must be denied until the agency is able to implement the required risk management practices.

Implementation of Risk Management Practices and Termination of Non-Compliant AI

The NEH AI policy and procedures classify AI tools as approved or public. Approved AI tools are provided as part of the NEH General Support System or built into agency software applications. Public AI tools are available by web browser unless specifically prohibited by security policy and may be used only on publicly available data. The AI use policy and procedures include specific permitted and prohibited uses of approved and public AI tools. Not adhering to this policy could lead to the improper use of AI tools causing proprietary and personal data leaks and unintentionally introducing malicious software into the NEH environment. NEH leverages continuous monitoring and data loss protection to enforce its AI use policy.

The NEH AI governance process ensures oversight of all AI use cases at NEH and approves or denies each case. Any AI use identified as high impact will be denied per NEH AI use policy and procedures. If NEH decides to pursue a high impact AI project, the AI use policy and procedures must be revised, risk management practices implemented, and processes established to terminate non-compliant AI.