



NATIONAL ENDOWMENT FOR THE HUMANITIES

NEH COMPLIANCE PLAN FOR OMB MEMORANDUM M-25-21 September 2025

Prepared by Beth Stewart, Acting Chief AI Officer

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 Acting Chief Artificial Intelligence Officer to the Acting Chief Information Officer. NEH is developing its first AI use policy and procedures that will 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 an agency review board for AI use, incorporating AI use into risk management procedures, and enhancing the AI capabilities of its workforce, NEH will leverage 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 will remove 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 will establish an agency AI board for reviewing and approving AI use cases, outline requirements to safeguard data and protect privacy, and define how AI tools will be aligned with agency risk management processes. With this policy in place, NEH will ensure 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 applications at NEH. Uses could 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 will enable 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 proof-of-concept AI solutions and gauge agency readiness for additional AI adoption. To increase employees' AI skillset, NEH will offer its employees specialized training in a variety of formats as part of the release of AI tools and include AI in its annual security and privacy training. The maturation of AI usage and AI talent would be improved by hiring additional experts with skill in AI applications and data analysis.

2. IMPROVING AI GOVERNANCE

Agency Policies

NEH is reviewing now its first AI use policy and procedures. Additional revisions to agency policies and procedures will include revision of cybersecurity policies, leverage of AI-enhanced cybersecurity tools, and confirmation that deployment and monitoring of NEH IT infrastructure is cognizant of AI use. The agency's AI policy and procedures will be incorporated into the agency's annual security awareness and privacy training for staff members. As NEH prepares to make AI tools available to staff members for the first time, guidance from industry experts is being leveraged to implement and test safeguards and develop oversight for generative AI. In addition, agency policy and procedures will define acceptable and unacceptable use.

AI Use Case Inventory

NEH staff will be encouraged to provide AI use cases to the CAIO for review. The NEH AI use policy and procedures will 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. The CAIO will initiate the review process with the NEH AI review board, gauge the impact of the use case, and provide a timely response on feasibility and a timeline for implementation if the use case is approved. 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 considered 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 NEH AI review board will review AI use cases and determine whether the case could be defined as 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, unapproved, and disapproved (rejected). A register of these determinations will be provided to staff and maintained by the AI review board. NEH staff members will not use unapproved or disapproved AI technology during their work within the NEH. Unapproved technology that has not received formal approval or disapproval may be used only on publicly available data with constraints defined clearly by agency policy. 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. Technology that is not approved will be identified through the agency's continuous monitoring process, blocked, and immediately uninstalled from the network.

The CAIO and NEH AI review board will perform oversight of all AI use cases at NEH and approve or deny 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.