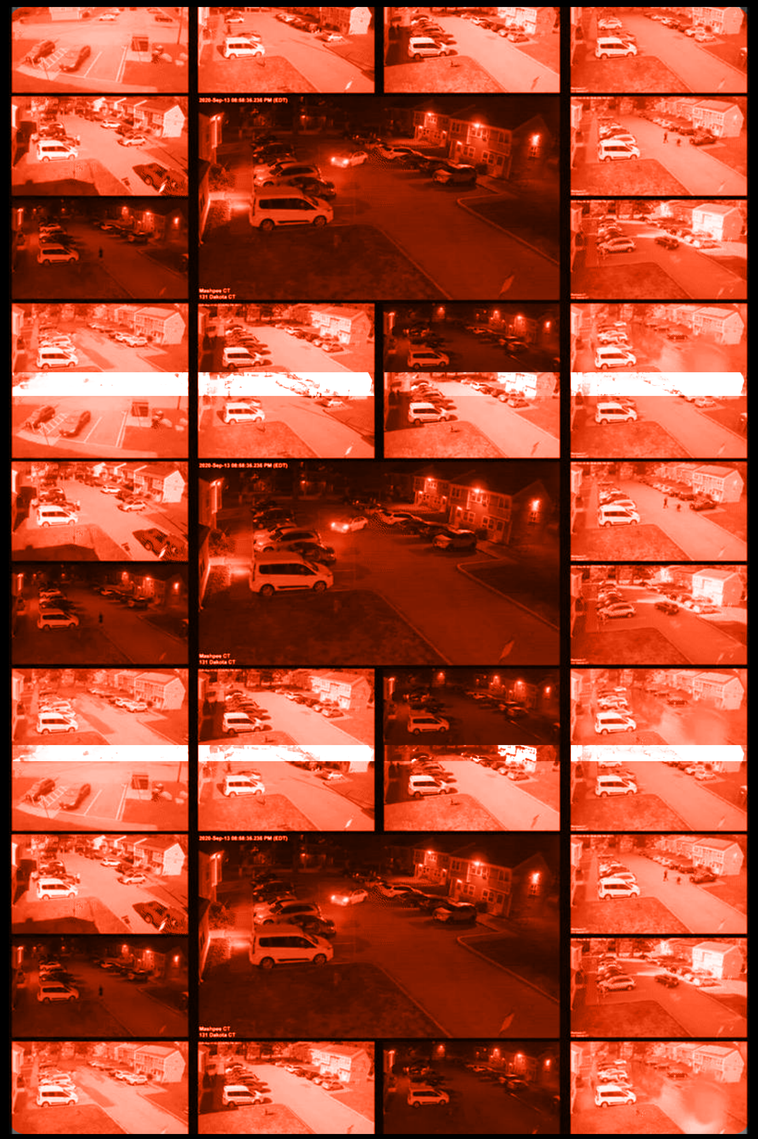
One Bad NOFO?

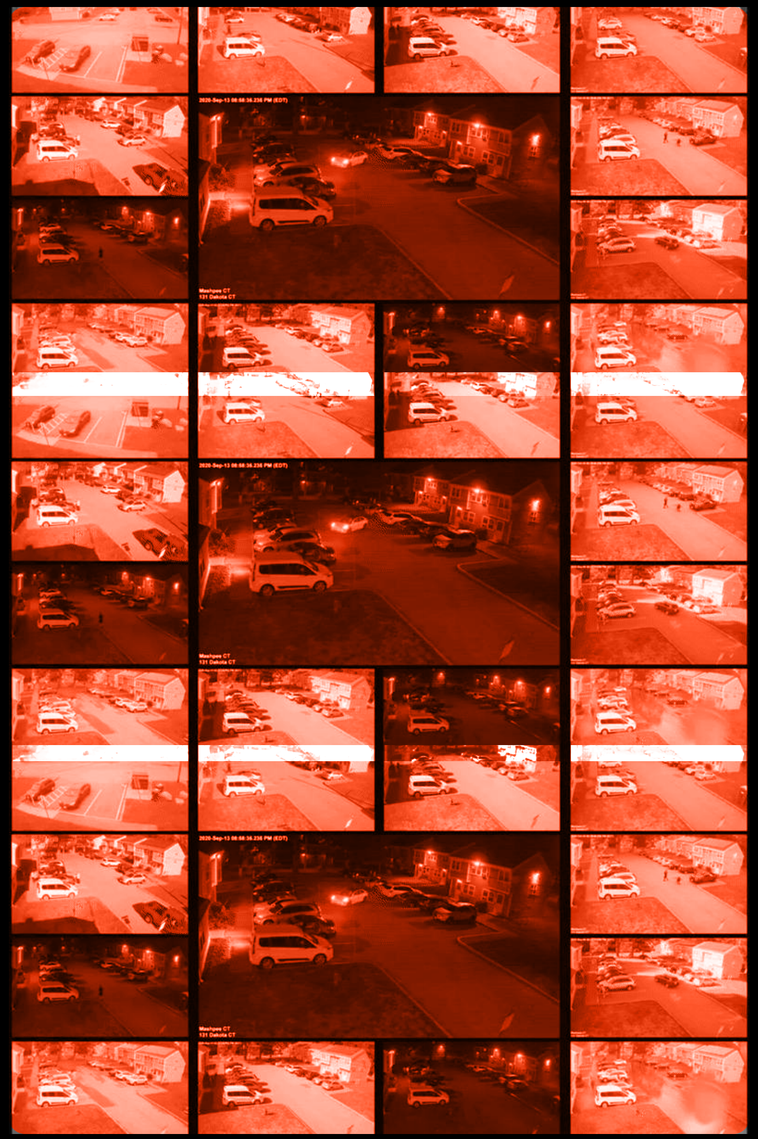
AI Governance in Federal Grantmaking

Dan Bateyko and Karen Levy
Cornell University

FAccT '25, June 23--26, 2025, Athens, Greece



Federal Grants Gone Wrong



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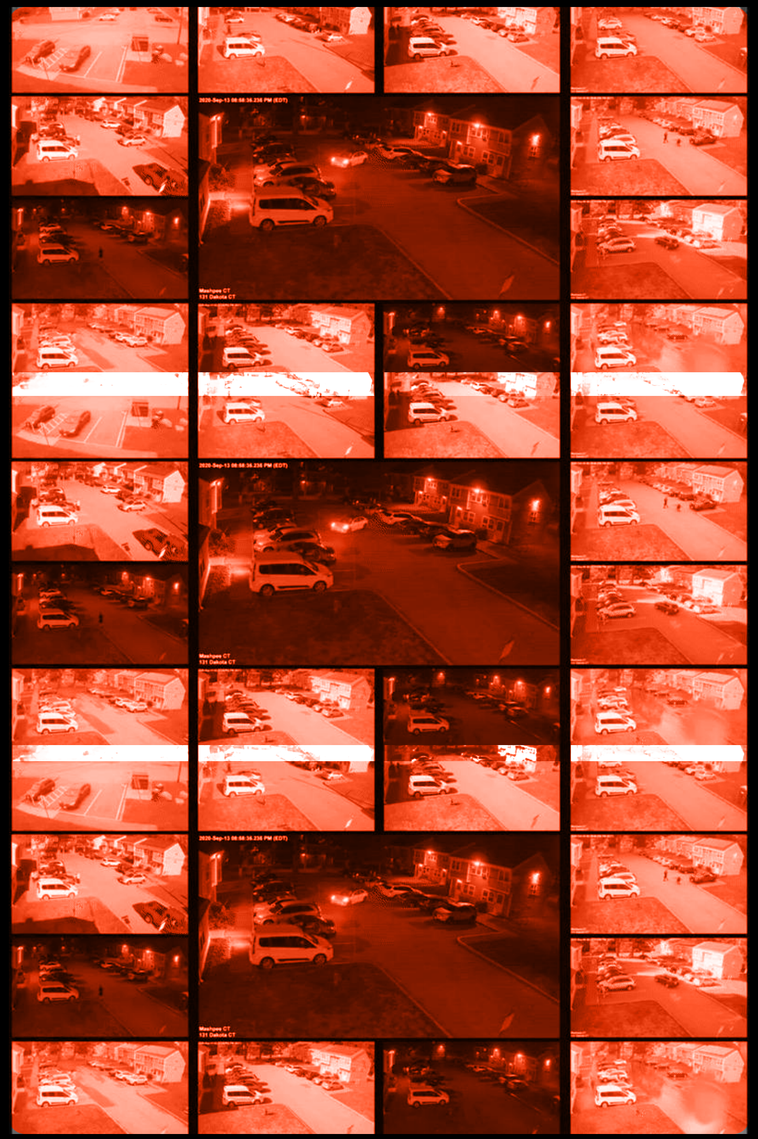
For years, the federal government made public housing grants to prevent crime. Officials spent those grant dollars on surveillance cameras with facial recognition software.



Federal Grants Gone Wrong

For years, the federal government made public housing grants to prevent crime. Officials spent those grant dollars on surveillance cameras with facial recognition software.

But in addition to deterring crime, officials turned those cameras inward, *using them to monitor residents, flag minor infractions, and justify evictions.*

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

Special Attention of:
Public Housing Agency Directors;
Public Housing Field Office Directors

Notice: PIH 2023-10 REVISED

Issued: May 13, 2025

Expires: This Notice supersedes Notice PIH 2022-05. This Notice remains in effect until amended, superseded, or rescinded. This Notice was amended June 14, 2023.

Cross References: Public Law No: 117-103, 116-260, Public Law 116-94, Public Law 113-76, Public Law 113-6, Public Law 112-55, Public Law 111-117, Public Law 118-42; Public Law 119-4, 24 CFR 905.200(b), 24 CFR 905.204, and Section 9(d) of the United States Housing Act of 1937

Subject: Emergency Safety and Security Grants Annual Funding Notification and Application Process

1. PURPOSE

This Notice provides guidance to public housing agencies (PHAs) on how to apply for Capital Fund Emergency Safety and Security Grants (ESSG) to fund safety and security emergencies. A "safety and security emergency" is defined as an emergency that may arise from: 1) an immediate need for funding by the PHA to implement safety and security measures necessary to address crime and drug-related activity; or 2) a safety emergency which requires the purchase, repair, replacement, or installation of carbon monoxide alarms/detectors, and or smoke/heat alarms/detectors.

2. BACKGROUND

Each year, funds within the Public Housing Fund appropriation are set aside to fund emergencies and natural disasters, specifically to address needs resulting from unforeseen or unpreventable emergencies and natural disasters, excluding Presidentially Declared disasters, occurring in the current fiscal year. Within the set-aside, Congress may appropriate specific funding to provide assistance to PHAs for emergency capital needs for safety and security, including measures necessary to address crime and drug-related activity.

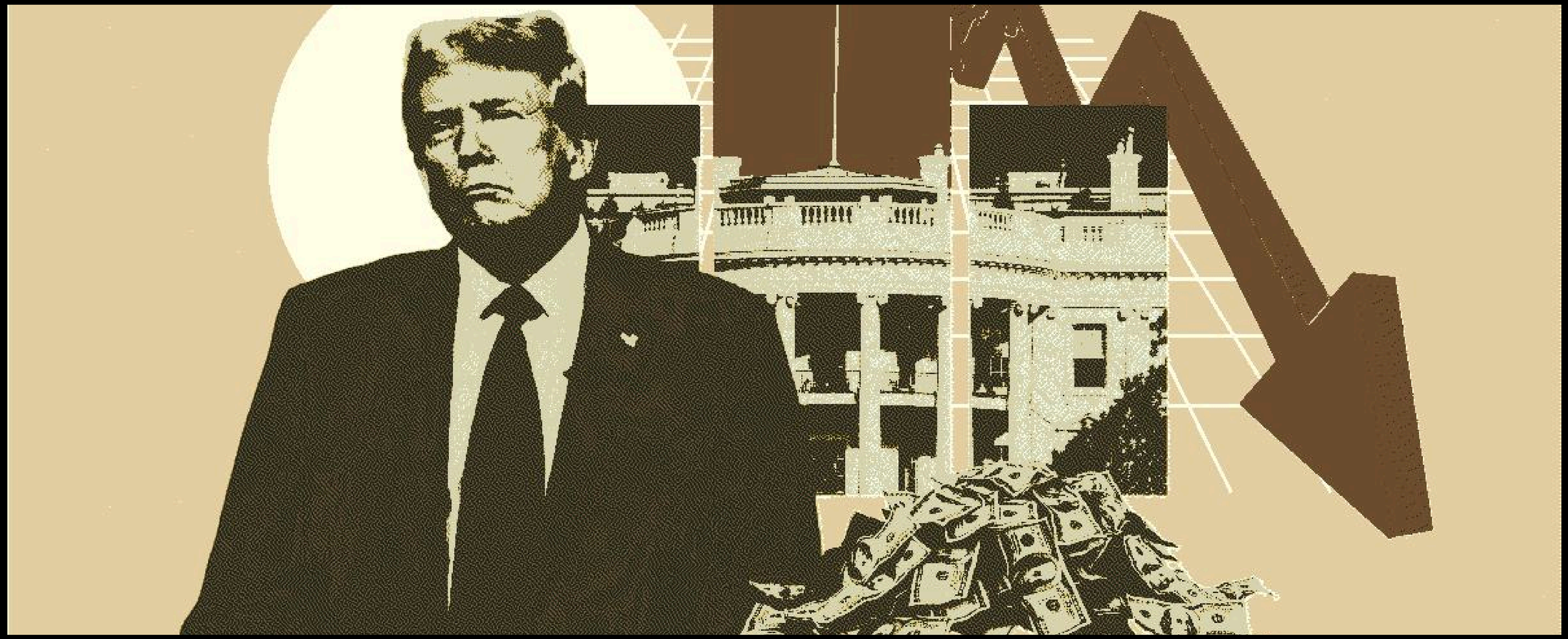
. Non-Eligible Uses

1. Any equipment that is purchased, leased, or contracted for security that is produced by the Huawei Technologies Company, ZTE Corporation, Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities)

2. Patrol cars

3. Salaries for PHA security staff

4. Automated surveillance and facial recognition technology



Newsweek

AI grant spending is increasing just as the federal funding freeze has highlighted the Executive Branch's sweeping (and often disputed) authority over grant policy.

Grant seekers may soon pitch AI as the fix for everything from housing to healthcare.

Are agencies ready to evaluate their proposals? Can they guard against AI risks?

Research Questions

Which discretionary grants promote AI?

How do U.S. federal agencies govern grantees' use of AI?

Key Findings

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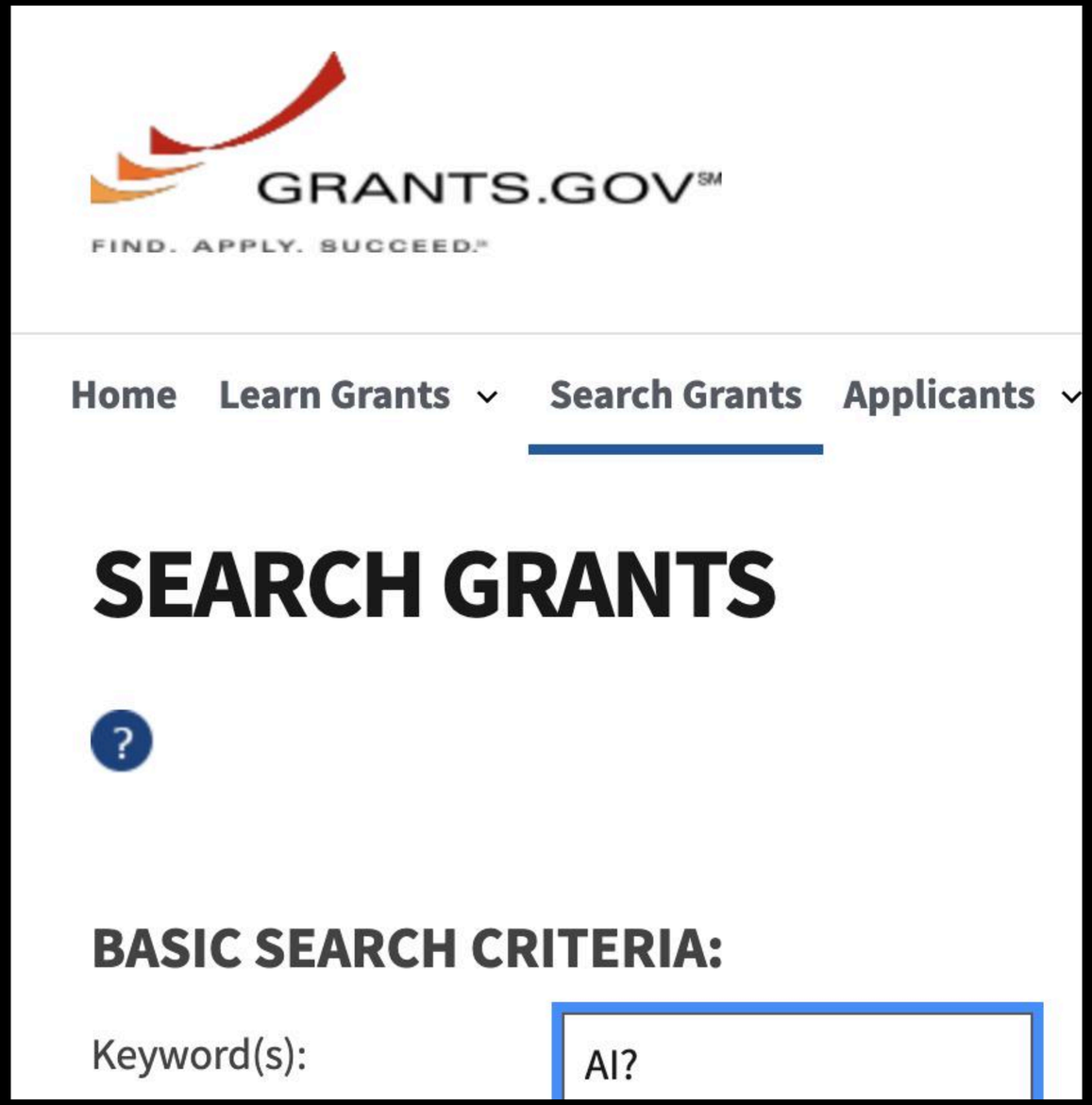
Agencies encourage AI use in high-risk contexts.

Agencies have the power to set AI-specific grant conditions.

AI grant conditions are rare.

Methods

Dataset



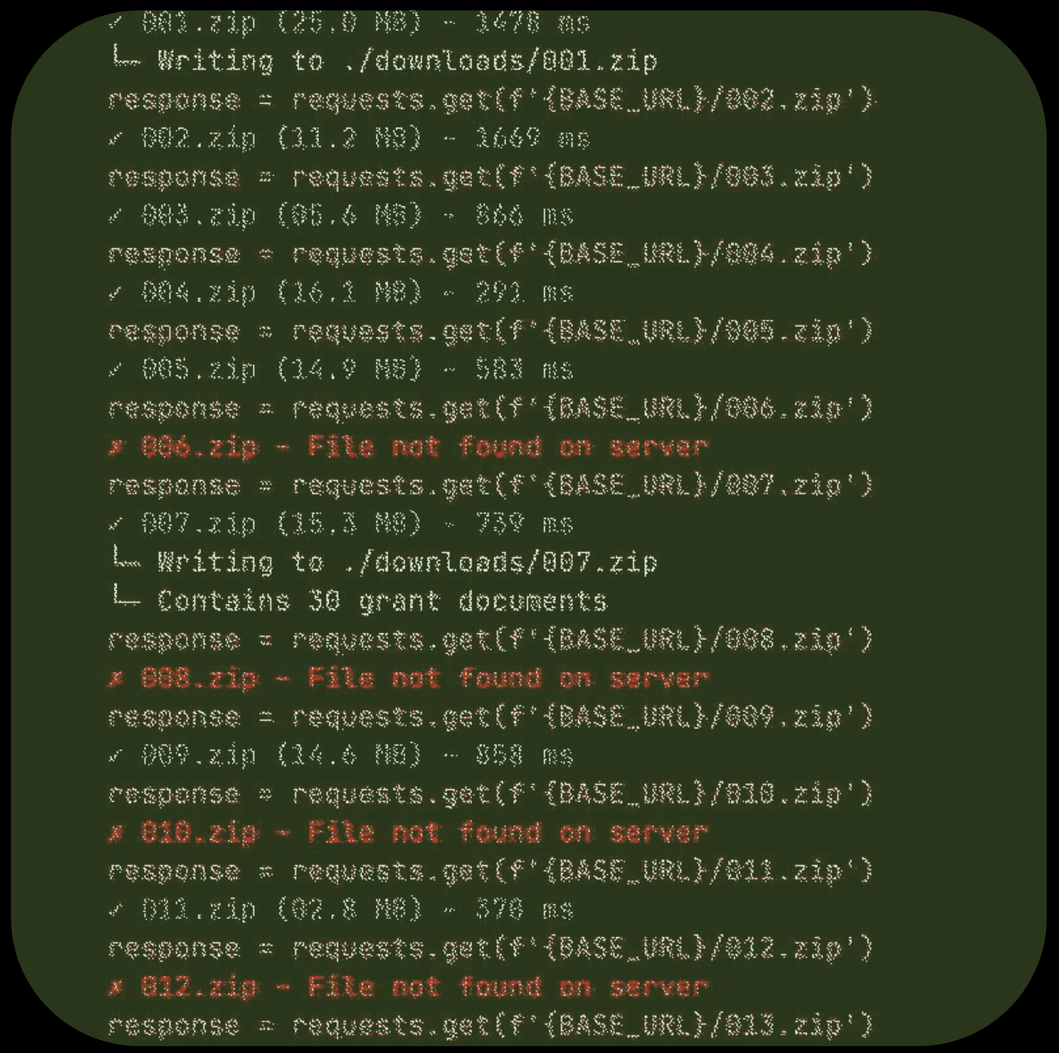
We gather 40,514 non-defense federal grant notices of funding opportunity (NOFOs) posted to Grants.gov between 2009 and 2024.

Filtering

AI Keywords
artificial intelligence, machine learning, deep learning, supervised learning, unsupervised learning, semi-supervised learning, reinforcement learning, transfer learning, generative AI, genAI, foundation model, AI model, model weight

We search NOFOs for AI-related terms drawn from Trump and Biden policy documents (M-25-21, M-24-10). We then manually review the results, arriving at **407 AI-related notices.**

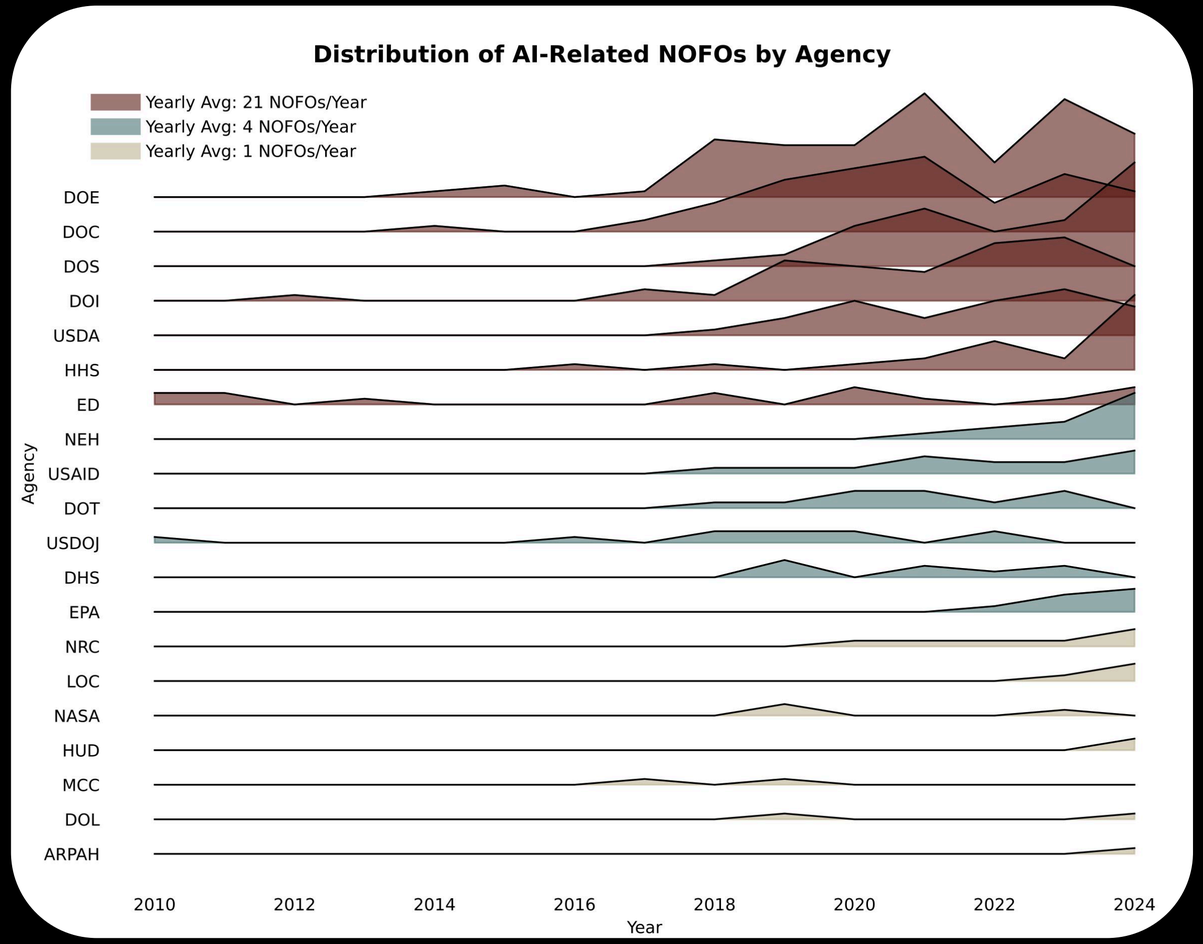
Coverage



38 agencies post NOFOs to Grants.gov. However, major research funders like the National Science Foundation and the National Institutes of Health seldom do.

Results

AI-Related Grant Notices Are Increasing



Direct Funding of AI

Opportunities explicitly funding AI activities, such as developing AI tools, basic and applied research, and training people in working with AI.

60
AI Tools or Initiatives

124
AI Research

108
AI Education and Professional Development

6
AI-Related Business Opportunities

109

Grant announcements **indirectly fund AI** by nudging recipients towards AI tools as ‘areas of opportunity,’ ‘technologies of interest,’ or ‘attractive alternatives,’ that can ‘unlock potential benefits.’

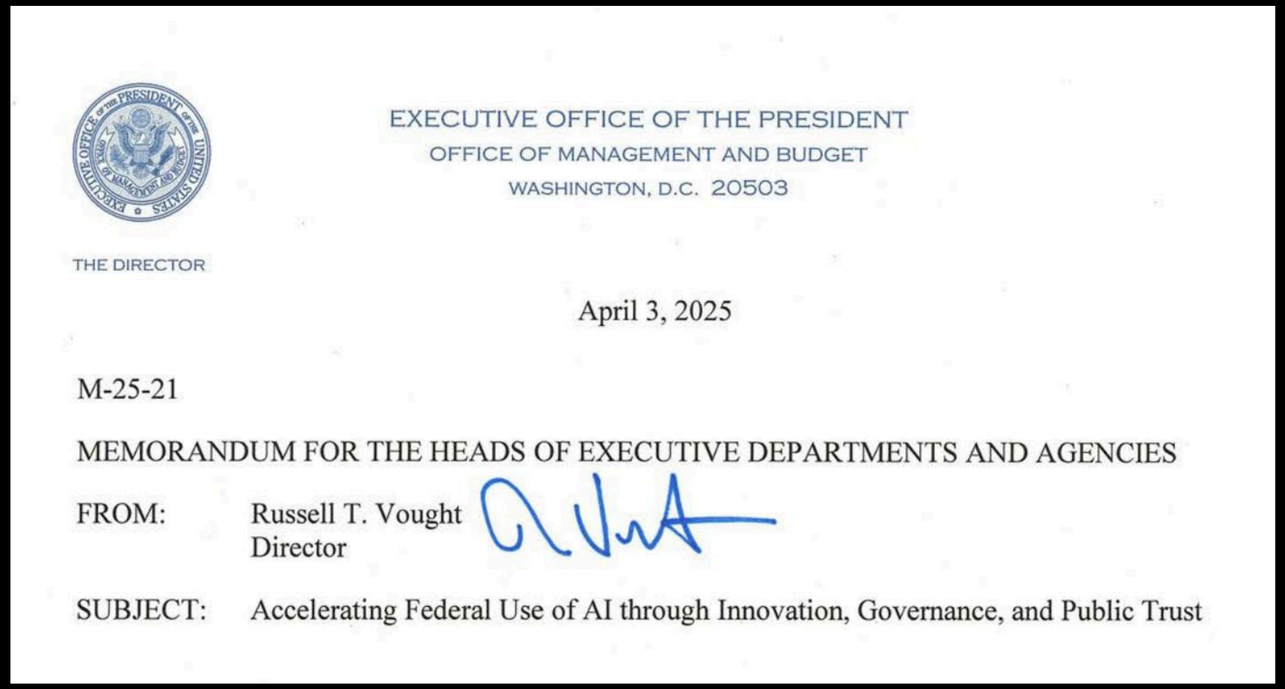
1/3

of spending records associated with these AI-related grants do not mention AI. Spending records may undercount AI funding activities.

Rights-Impacting AI

Two months ago, the Trump administration rescinded Biden-era procedures for agencies procuring "rights-impacting" AI. But in reality, the White House's new policy extends many of the same protections for "high-impact" contexts.

Our review identified 25 grant opportunities in possible rights-impacting domains—namely, law enforcement, education, and healthcare.



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

THE DIRECTOR

April 3, 2025

M-25-21

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: Russell T. Vought
Director

SUBJECT: Accelerating Federal Use of AI through Innovation, Governance, and Public Trust

Illustrative Examples

Law Enforcement

The Department of Justice funds AI for predicting recidivism, managing parole, and identifying suspects.

Education

The Department of Education funds AI to monitor student progress, including for students with disabilities.

Healthcare

USAID funds AI to flag individuals at higher health risks, such as HIV exposure.

Only 9 NOFOs Set Criteria for AI Use

Disclosures

Applicants that disclose AI use plans are scored favorably.

Discouragements

Applicants that propose to use AI are scored negatively.

Prohibitions

Applicants that propose to use AI will be rejected.

Disclosures

"The applicant… will be expected to include details on how Natural Language Processing and machine learning methods will be used, the characteristics of cases that will be evaluated… and the methods to determine and mitigate bias by the structures and processes of the health care systems providing the electronic health record data."

CDC's Prevention Research Centers

Discouragements

"We **strongly discourage** the use of generative AI and other digital tools and techniques that make it difficult for audiences to distinguish between authentic archival historical materials and those fabricated by the production team to seem authentic."

National Endowment for the Humanities

Prohibitions

“ Awardees **must not** use generative artificial intelligence (generative AI) to create or produce any project materials. For purposes of this restriction, generative AI tools are those that produce synthetic text, images, code, video, and music in response to user prompts and include, but are not limited to, ChatGPT, BARD, DALL-E, MidJourney, and Stable Diffusion.”

Library of Congress

Discussion

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Current Practices

Pre-award condition clauses are scarce and mostly generic (disclose, discourage, ban). Grant offices, inspired by private sector successes, may overvalue AI uses.

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Lessons from Procurement

Similar pitfalls! Grant offices must deal with vendor hype and training gaps, but have opportunities for tailoring terms by treating grant conditions as policy.

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Grantmaking Hurdles

At the pre-award stage, conditions can deter or delay applications. In the post-award stage, agency capacity to monitor grants is thin: there are thousands of recipients, but few enforcers.

Open Questions

How can agencies build AI expertise into the grant review process?

Could alternative funding arrangements fund innovation without sacrificing oversight?

What might state-level experiments in AI grant governance teach us?

Questions?

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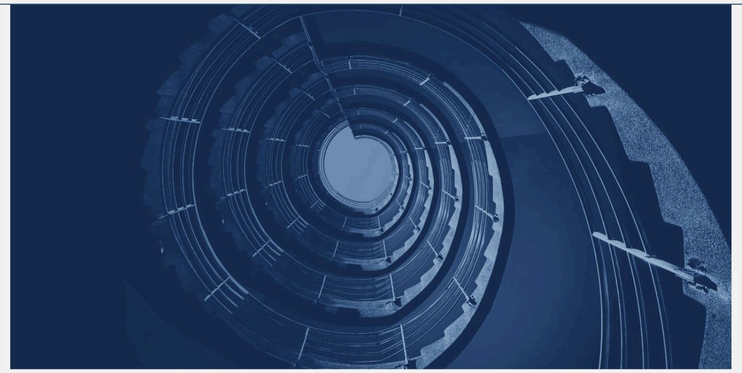

SEE ALL PUBLICATIONS

EMERGING TECHNOLOGY DAY ONE PROJECT

Blank Checks For Black Boxes: Bring AI Governance To Competitive Grants

01.30.25 | 9 MIN READ | TEXT BY DAN BATEYKO

The misuse of AI in federally-funded projects can risk public safety and waste taxpayer dollars.

The Trump administration has a pivotal opportunity to spot wasteful spending, promote public trust in AI, and safeguard Americans from unchecked AI decisions. **To tackle AI risks in grant spending, grant-making agencies should adopt trustworthy AI practices in their grant competitions and start enforcing them against reckless grantees.**

Federal AI spending could soon skyrocket. One ambitious legislative plan from a Senate AI Working Group calls for doubling non-defense AI spending to $32 billion a year by 2026. That funding would grow AI across R&D, cybersecurity, testing infrastructure, and small business support.

Yet as federal AI investment accelerates, safeguards against snake oil lag behind. Grants can be wasted on AI that doesn't work. Grants can pay for untested AI with unknown risks. Grants can blur the lines of who is accountable for fixing AI's mistakes. And grants offer little recourse to

State Department’s Internet Freedom NOFO

Disclosure

Projects that include the development or use of artificial intelligence and/or machine learning **must clearly indicate this.**

Assessment

Any development or use of artificial intelligence and/or machine learning will…include **subjecting any** tool or resource employing **artificial intelligence** or machine learning **to an AI impact assessment and operational testing** before public deployment…

Discouragements

Activities that are **not typically considered competitive include**..Projects focused on digital technologies (e.g. **artificial intelligence**, blockchain, virtual reality) **without a clear strategic reason and focus on protecting human rights online.**

Basic Research, Lethal Effects: Military AI Research Funding as Enlistment

David Gray Widder
Digital Life Initiative, Cornell University

Sireesh Gururaja
School of Computer Science, Carnegie Mellon University

Lucy Suchman
Department of Sociology, Lancaster University

Abstract

In the context of unprecedented U.S. Department of Defense (DoD) budgets, this paper examines the recent history of DoD funding for academic research in algorithmically based warfighting. We draw from a corpus of DoD grant solicitations from 2007 to 2023, focusing on those addressed to researchers in the field of artificial intelligence (AI). Considering the implications of DoD funding for academic research, the paper proceeds through three analytic sections. In the first, we offer a critical examination of the distinction between basic and applied research, showing how funding calls framed as basic research nonetheless enlist researchers in a war fighting agenda. In the second, we offer a diachronic analysis of the corpus, showing how a 'one small problem' caveat, in which affirmation of progress in military technologies is qualified by acknowledgement of outstanding problems, becomes justification for additional investments in research. We close with an analysis of DoD aspirations based on a subset of Defense Advanced Research Projects Agency (DARPA) grant solicitations for the use of AI in battlefield applications. Taken together, we argue that grant solicitations work as a vehicle for the mutual enlistment of DoD funding agencies and the academic AI research community in setting research agendas. The trope of basic research in this context offers shelter from significant moral questions that military applications of one's research would raise, by obscuring the connections that implicate researchers in U.S. militarism.

Keywords: artificial intelligence; US Department of Defense; military; funding; investment, war

Introduction

The United States Department of Defense (DoD) was arguably the first major investor in the field of artificial intelligence (AI), and remains one even amidst the ascendance of corporate players. Defense spending on AI nearly tripled from 2022 to 2023 (Henshall 2024), and in 2024 the DoD requested

Number of Attached NOFOs Gathered from Grants.gov Records

agency																	
AC													6/6 (100.0%)	8/8 (100.0%)	7/7 (100.0%)	4/4 (100.0%)	25/25 (100.0%)
FCC														2/2 (100.0%)	2/2 (100.0%)		4/4 (100.0%)
SCRC																1/1 (100.0%)	1/1 (100.0%)
NRC	4/4 (100.0%)	8/8 (100.0%)	3/3 (100.0%)	7/7 (100.0%)		6/6 (100.0%)	5/5 (100.0%)	1/1 (100.0%)	1/1 (100.0%)	1/1 (100.0%)	1/1 (100.0%)	2/2 (100.0%)	2/2 (100.0%)	4/4 (100.0%)	4/4 (100.0%)	4/4 (100.0%)	53/53 (100.0%)
LOC													6/6 (100.0%)		6/6 (100.0%)	3/3 (100.0%)	15/15 (100.0%)
ARPAH																1/1 (100.0%)	1/1 (100.0%)
FDA		1/1 (100.0%)															1/1 (100.0%)
IAF															1/1 (100.0%)		1/1 (100.0%)
DOC	27/30 (90.0%)	49/53 (92.5%)	88/93 (94.6%)	66/67 (98.5%)	91/91 (100.0%)	77/77 (100.0%)	93/93 (100.0%)	92/92 (100.0%)	76/76 (100.0%)	84/84 (100.0%)	79/79 (100.0%)	76/76 (100.0%)	106/108 (98.1%)	71/72 (98.6%)	100/103 (97.1%)	100/100 (100.0%)	1275/1294 (98.5%)
USAID	96/97 (99.0%)	108/110 (98.2%)	131/137 (95.6%)	118/124 (95.2%)	118/122 (96.7%)	131/136 (96.3%)	108/112 (96.4%)	77/80 (96.2%)	96/102 (94.1%)	81/87 (93.1%)	98/102 (96.1%)	92/92 (100.0%)	126/127 (99.2%)	107/108 (99.1%)	100/103 (97.1%)	104/108 (96.3%)	1691/1747 (96.8%)
ED	115/129 (89.1%)	136/147 (92.5%)	88/105 (83.8%)	84/95 (88.4%)	93/94 (98.9%)	113/114 (99.1%)	101/101 (100.0%)	72/72 (100.0%)	57/57 (100.0%)	67/67 (100.0%)	77/78 (98.7%)	83/83 (100.0%)	80/80 (100.0%)	77/77 (100.0%)	78/78 (100.0%)	75/75 (100.0%)	1396/1452 (96.1%)
DHS	45/94 (47.9%)	55/56 (98.2%)	92/92 (100.0%)	78/80 (97.5%)	52/53 (98.1%)	65/67 (97.0%)	48/48 (100.0%)	76/77 (98.7%)	72/75 (96.0%)	81/83 (97.6%)	94/94 (100.0%)	107/112 (95.5%)	109/110 (99.1%)	113/118 (95.8%)	88/89 (98.9%)	28/30 (93.3%)	1203/1278 (94.1%)
USDA	95/121 (78.5%)	125/150 (83.3%)	97/112 (86.6%)	108/119 (90.8%)	78/100 (78.0%)	109/126 (86.5%)	87/115 (75.7%)	108/124 (87.1%)	106/125 (84.8%)	123/141 (87.2%)	150/159 (94.3%)	166/179 (92.7%)	144/165 (87.3%)	216/232 (93.1%)	216/245 (88.2%)	153/182 (84.1%)	2081/2395 (86.9%)
DOS	71/76 (93.4%)	120/125 (96.0%)	117/124 (94.4%)	162/203 (79.8%)	181/206 (87.9%)	201/250 (80.4%)	268/306 (87.6%)	290/375 (77.3%)	315/394 (79.9%)	387/483 (80.1%)	457/565 (80.9%)	479/581 (82.4%)	538/635 (84.7%)	493/597 (82.6%)	578/666 (86.8%)	672/778 (86.4%)	5329/6364 (83.7%)
FMCS		0/1 (0.0%)	1/1 (100.0%)				1/1 (100.0%)	1/1 (100.0%)	1/1 (100.0%)	1/1 (100.0%)							5/6 (83.3%)
DC									0/2 (0.0%)			3/3 (100.0%)	2/2 (100.0%)	1/1 (100.0%)	1/1 (100.0%)	3/3 (100.0%)	10/12 (83.3%)
DOI	484/693 (69.8%)	810/1275 (63.5%)	840/1188 (70.7%)	973/1310 (74.3%)	977/1231 (79.4%)	1324/1595 (83.0%)	1391/1734 (80.2%)	1716/2148 (79.9%)	1726/2127 (81.1%)	1406/1614 (87.1%)	1459/1601 (91.1%)	447/477 (93.7%)	362/369 (98.1%)	380/386 (98.4%)	466/472 (98.7%)	359/363 (98.9%)	15120/18583 (81.4%)
HUD	30/38 (78.9%)	25/34 (73.5%)	54/54 (100.0%)	24/24 (100.0%)	27/27 (100.0%)	21/25 (84.0%)	23/24 (95.8%)	16/28 (57.1%)	7/20 (35.0%)	7/25 (28.0%)	12/31 (38.7%)	7/30 (23.3%)	25/33 (75.8%)	38/38 (100.0%)	44/45 (97.8%)	32/33 (97.0%)	392/509 (77.0%)
DOL	12/13 (92.3%)	18/20 (90.0%)	20/22 (90.9%)	30/32 (93.8%)	27/38 (71.1%)	28/39 (71.8%)	25/38 (65.8%)	26/39 (66.7%)	15/27 (55.6%)	25/40 (62.5%)	31/36 (86.1%)	32/44 (72.7%)	31/47 (66.0%)	28/38 (73.7%)	43/53 (81.1%)	34/51 (66.7%)	425/577 (73.7%)
CPSC										1/1 (100.0%)	1/2 (50.0%)	1/2 (50.0%)	1/2 (50.0%)	1/1 (100.0%)	2/2 (100.0%)	1/1 (100.0%)	8/11 (72.7%)
SBA	0/13 (0.0%)	0/13 (0.0%)	8/12 (66.7%)	7/8 (87.5%)	12/13 (92.3%)	12/12 (100.0%)	12/12 (100.0%)	13/13 (100.0%)	15/15 (100.0%)	14/16 (87.5%)	13/14 (92.9%)	15/16 (93.8%)	10/14 (71.4%)	2/10 (20.0%)	9/16 (56.2%)	8/15 (53.3%)	150/212 (70.8%)
SSA	0/2 (0.0%)	0/2 (0.0%)	1/1 (100.0%)	1/1 (100.0%)	1/1 (100.0%)		1/1 (100.0%)	1/1 (100.0%)	1/1 (100.0%)	1/1 (100.0%)			2/2 (100.0%)	1/1 (100.0%)	1/4 (25.0%)	2/2 (100.0%)	13/20 (65.0%)
MCC	1/1 (100.0%)	2/2 (100.0%)	2/5 (40.0%)			0/2 (0.0%)	2/4 (50.0%)	1/1 (100.0%)	3/3 (100.0%)		1/1 (100.0%)						12/19 (63.2%)
EPA	2/135 (1.5%)	0/151 (0.0%)	0/85 (0.0%)	0/60 (0.0%)	30/60 (50.0%)	60/60 (100.0%)	70/70 (100.0%)	74/74 (100.0%)	47/48 (97.9%)	54/54 (100.0%)	71/72 (98.6%)	54/55 (98.2%)	89/89 (100.0%)	61/61 (100.0%)	102/103 (99.0%)	66/66 (100.0%)	780/1243 (62.8%)
CNCS	10/10 (100.0%)	7/8 (87.5%)	9/9 (100.0%)	4/4 (100.0%)	8/8 (100.0%)	8/8 (100.0%)	10/13 (76.9%)	0/9 (0.0%)	0/6 (0.0%)	0/6 (0.0%)	0/4 (0.0%)	0/5 (0.0%)					56/90 (62.2%)
DOT	30/52 (57.7%)	32/101 (31.7%)	41/79 (51.9%)	34/54 (63.0%)	42/79 (53.2%)	34/55 (61.8%)	29/61 (47.5%)	41/73 (56.2%)	24/51 (47.1%)	31/60 (51.7%)	44/66 (66.7%)	55/78 (70.5%)	54/67 (80.6%)	69/90 (76.7%)	88/123 (71.5%)	78/116 (67.2%)	726/1205 (60.2%)
USDOT	0/4 (0.0%)	1/3 (33.3%)	0/4 (0.0%)	2/5 (40.0%)	0/5 (0.0%)	7/10 (70.0%)	15/17 (88.2%)	24/24 (100.0%)	13/15 (86.7%)	8/12 (66.7%)	4/7 (57.1%)	3/8 (37.5%)	4/10 (40.0%)	3/12 (25.0%)	4/12 (33.3%)	5/9 (55.6%)	93/157 (59.2%)
VA	3/4 (75.0%)	3/4 (75.0%)	0/3 (0.0%)	1/5 (20.0%)	4/6 (66.7%)	1/5 (20.0%)	2/5 (40.0%)	4/6 (66.7%)	3/7 (42.9%)	4/6 (66.7%)	5/6 (83.3%)	4/8 (50.0%)	4/7 (57.1%)	7/11 (63.6%)	10/13 (76.9%)	10/16 (62.5%)	65/112 (58.0%)
IMLS							0/3 (0.0%)	0/11 (0.0%)	0/14 (0.0%)	0/13 (0.0%)	0/15 (0.0%)	0/12 (0.0%)	14/16 (87.5%)	13/13 (100.0%)	14/14 (100.0%)	13/15 (86.7%)	54/126 (42.9%)
USDOJ	74/133 (55.6%)	109/229 (47.6%)	108/131 (82.4%)	107/163 (65.6%)	106/161 (65.8%)	108/151 (71.5%)	92/168 (54.8%)	78/195 (40.0%)	48/132 (36.4%)	47/176 (26.7%)	64/177 (36.2%)	51/184 (27.7%)	43/181 (23.8%)	59/241 (24.5%)	35/258 (13.6%)	3/274 (1.1%)	1132/2954 (38.3%)
HHS	337/1001 (33.7%)	357/1252 (28.5%)	275/1170 (23.5%)	245/1225 (20.0%)	201/1281 (15.7%)	286/1344 (21.3%)	326/1306 (25.0%)	355/1510 (23.5%)	188/1497 (12.6%)	220/1525 (14.4%)	334/1319 (25.3%)	570/1200 (47.5%)	838/1282 (65.4%)	825/1152 (71.6%)	1071/1249 (85.7%)	1103/1476 (74.7%)	7531/20789 (36.2%)
DOE	1/79 (1.3%)	0/76 (0.0%)	2/86 (2.3%)	6/82 (7.3%)	10/83 (12.0%)	22/116 (19.0%)	34/107 (31.8%)	26/145 (17.9%)	16/64 (25.0%)	36/93 (38.7%)	47/107 (43.9%)	50/99 (50.5%)	48/90 (53.3%)	51/124 (41.1%)	114/148 (77.0%)	128/138 (92.8%)	591/1637 (36.1%)
EAC	0/2 (0.0%)	1/5 (20.0%)													2/2 (100.0%)		3/9 (33.3%)
NEH	0/48 (0.0%)	0/37 (0.0%)	0/39 (0.0%)	0/32 (0.0%)	0/26 (0.0%)	0/32 (0.0%)	0/35 (0.0%)	0/33 (0.0%)	0/33 (0.0%)	0/35 (0.0%)	0/37 (0.0%)	0/32 (0.0%)	18/34 (52.9%)	29/30 (96.7%)	27/29 (93.1%)	33/50 (66.0%)	107/562 (19.0%)
ONDCP				0/1 (0.0%)	0/1 (0.0%)	0/2 (0.0%)	0/3 (0.0%)	0/2 (0.0%)	0/4 (0.0%)	0/4 (0.0%)	2/3 (66.7%)	4/5 (80.0%)	2/4 (50.0%)	0/4 (0.0%)	0/6 (0.0%)	0/9 (0.0%)	8/48 (16.7%)
NCUA		0/7 (0.0%)														1/1 (100.0%)	1/8 (12.5%)
NASA	0/50 (0.0%)	0/90 (0.0%)	0/90 (0.0%)	1/83 (1.2%)	0/84 (0.0%)	0/83 (0.0%)	2/90 (2.2%)	2/89 (2.2%)	2/70 (2.9%)	1/93 (1.1%)	6/87 (6.9%)	3/108 (2.8%)	0/98 (0.0%)	0/115 (0.0%)	46/109 (42.2%)	87/122 (71.3%)	150/1461 (10.3%)
NCD	0/2 (0.0%)			2/2 (100.0%)			0/2 (0.0%)	0/5 (0.0%)	0/2 (0.0%)	0/3 (0.0%)	0/3 (0.0%)	0/3 (0.0%)	0/4 (0.0%)	0/1 (0.0%)	0/1 (0.0%)		2/28 (7.1%)
NEA	0/17 (0.0%)	0/11 (0.0%)	0/11 (0.0%)	0/7 (0.0%)	0/8 (0.0%)	0/11 (0.0%)	0/12 (0.0%)	0/13 (0.0%)	0/13 (0.0%)	0/15 (0.0%)	0/10 (0.0%)	0/13 (0.0%)	4/16 (25.0%)	0/12 (0.0%)	0/11 (0.0%)	0/14 (0.0%)	4/194 (2.1%)
NSF	0/205 (0.0%)	0/157 (0.0%)	0/144 (0.0%)	0/137 (0.0%)	0/87 (0.0%)	0/29 (0.0%)	0/4 (0.0%)	0/2 (0.0%)	0/1 (0.0%)	0/13 (0.0%)	0/9 (0.0%)	0/17 (0.0%)	0/15 (0.0%)	0/49 (0.0%)	0/73 (0.0%)	0/103 (0.0%)	0/1045 (0.0%)