NEBRASKA PUBLIC MEDIA AI USAGE POLICY (260715)

This document provides guidance for the use of generative AI (gAI) and agentic AI (together: "AI tools") by Nebraska Public Media ("NPM") staff. This policy is built upon a set of guiding principles. Its purpose is to spur conversation across the org about appropriate uses of AI tools, primarily in the creation of editorial and promotional content, and/or digital assets for that content. Use of AI tools for process/systems administration will be handled on a departmental basis but is still worth discussing.

When in doubt, refer to the guiding principles below and then check with your manager, who may consult with a Leadership Team ("LT") representative for additional guidance.

We intend this policy to be a permission slip for experimentation, not an avenue to punishment. At the same time, misuse of AI tools can create serious legal, editorial, security, and reputational risks. So please note that violations of this policy may result in corrective guidance, additional training, or, in more serious cases, disciplinary action up to and including termination of employment.

Guiding Principles

- **People First**: We will prioritize AI applications that augment our capabilities. Consult with your manager and discuss any ideas for using generative AI tools and agentic AI services in your work. Our priority is to empower NPM staff and support the good work we are already doing.
- **People Last**: AI tools are impactful, but not infallible. We will prioritize human oversight as essential to ensure that the outputs meet NPM's values and standards.
- **Process Matters**: We will use AI to enhance the process of creation, always ensuring the output serves a clear, mission-aligned purpose. We will embrace creative friction to improve our work and will not automate the generation of content simply because the barrier to creation is low.
- **Transparency and Editorial Accountability**: We will disclose when and how AI tools have influenced editorial content (see Accountability and Transparency below). Transparency is a cornerstone of public trust and shows our adherence to the highest editorial principles.
- **Truth and Authenticity**: We will not stray from our editorial principles in experimentation with AI tools, whether the content is journalistic, educational, or entertainment focused. The use of AI tools should never compromise the authenticity and accuracy expected of us by audiences.
- **Bias Mitigation**: We will ensure that content generated by AI does not inadvertently propagate or perpetuate stereotypes or prejudice. AI tools can reflect and amplify societal biases present in their training data. Special care must be taken to proactively identify and mitigate biases, preventing marginalization or harm.
- **Continual Education**: We will seek out or create opportunities to learn about the latest advancements and best practices in the realm of AI. As AI is a rapidly evolving technology, regular training and updating of capabilities, risk, and knowledge are essential.
- **Collaboration and Shared Learning**: We will actively seek collaboration opportunities, both internally and across public media. Lessons learned and best practices developed from AI experimentation should be documented and shared, fostering a culture of shared learning.
- **Accessibility and Inclusivity**: We will ensure that AI tools and the content or solutions derived from them are accessible to all, regardless of abilities or disabilities. AI development and application should consider diverse perspectives to prevent biases and promote inclusivity.

AI Definitions and Examples

For the purposes of this policy, AI tools differ from AI-infused software (aka machine learning) already common in everyday life, like autocorrect, the algorithms that make mobile phone photography more appealing to the human eye, or tools that facilitate automated captioning.

Generative AI tools require active engagement with a chat or voice interface to create specific outputs based on predictive models. As a general rule, we recommend only using leading AI tools from the major product creators. **Your manager, director, or EP may require pre-authorization of gAI tools in certain situations. Always ask.**

Leading gAI tools* include but are not limited to:

- **AI Search Tools**: Google Search, ChatGPT Search, Perplexity
- **Chatbot Ecosystems**: ChatGPT, Google Gemini, Claude
- **Small, Purpose-Built AI Tools**: OpusClip
- **Generative Coding Tools**: Claude Code, ChatGPT Codex, Github Copilot**
- **Generative Image Tools**: Midjourney, Google NanoBanana 2, Adobe Firefly
- **Generative Voice Tools**: ElevenLabs
- **Generative Music Tools**: Suno, Lyria, Udio
- **Generative Video Tools**: Veo 3, Runway
- **Generative Modeling Tools**: Meta 3DGen, Nvidia Edify

*Product and even brand names will change, as this space continues to evolve quickly.
** See Digital Security Requirements below for restrictions on vibe coding.

Agentic AI tools are autonomous or semi-autonomous systems capable of exercising agency to pursue defined goals without continuous human prompting. An AI agent "understands" a user's objectives and its own operating context, then makes decisions and takes multi-step, interrelated actions to fulfill those objectives by independently using the software tools at its disposal. These agents differ fundamentally from generative AI, but they are not mutually exclusive. In fact, agentic AI can make use of generative AI tools in the completion of its tasks.

"*The easiest way to differentiate generative AI from agentic AI is to think of their primary functions. Generative AI is about producing something new, while agentic AI is about achieving something specific. One creates, and the other acts.*" –Bernard Marr

Nebraska Public Media may use agentic AI tools to advance our mission, including but not limited to:

- Comprehensive research and fact-gathering (treated as unreliable sources and fact-checked).
- Automated content discovery and personalized recommendations for audiences.
- Tools that automatically scan public meeting records to surface relevant information.
- Enhanced operational workflows (e.g., content tagging).

Because use of agentic AI is a delegation of an employee's agency to an AI system, even more care must be exercised than in the use of generative AI. **Use of agentic AI should be pre-authorized by a department manager (in consultation with their LT representative, or the Chief Innovation Strategist).**

WHY NEBRASKA PUBLIC MEDIA USES AI

AI is now used extensively in media. As a company whose core mission revolves around content creation using words, images, sounds and digital interactions, our primary objective is to use AI in ways that enhance our service, reflect our ongoing commitment to the highest journalistic standards, and protect the trust and relationship we have nurtured with our communities and supporters over the years.

Used in alignment with the guiding principles (above), AI tools can address key challenges in our day-to-day work. These tools can help you do more with the skills and abilities you already have, giving you more time for the creative, craft and skilled work that makes Nebraska Public Media successful. Using AI with human oversight can lead to:

- **Higher Quality Public Media**: AI tools can enhance the ideation, brainstorming, and review phases, leading to fresh perspectives, clarity of ideas, and thus better public media to serve Nebraskans. It can also help creators better organize their information, assess their ideas and consider different perspectives outside their own lived experience.
- **Greater Public Media Capacity**: AI tools can help increase our capacity to create content and services. Leveraging AI tools to automate routine tasks can help reduce human error, shorten time-consuming tasks, and optimize resource allocation, ensuring that Nebraska Public Media remains agile, competitive and responsible stewards of the resources invested in our mission.
- **Universal Service**: AI tools can help in discovery of public media. AI is becoming a key mediator between information and information consumers. Tactical formatting of information for AI consumption can lead to sustained impact of our content and services.

In crafting this policy, we have avoided framing AI as a collaborator, partner, or otherwise used language designed to depict AI as something quasi-human. We prefer the metaphor of orchestration, where humans use AI as instruments to achieve a whole that is greater than the sum of the parts.

This policy applies solely to the use of AI tools by NPM staff in the pursuit of NPM's mission. Guidelines for freelancers and contractors appear in Appendix A of this policy.

This policy does **not** apply to the use of AI tools in the creation of digital assets affiliated with work-for-hire clients and underwriting spots. Underwriting remains subject to the usual review to meet NPM standards. The policy does apply to co-productions where NPM shares editorial responsibilities.

This policy does **not** replace or supersede Nebraska Public Media's Editorial Guidelines. All uses of AI tools must conform to Nebraska Public Media's existing commitments to editorial independence, accuracy, fairness, balance, transparency, and public trust across all platforms.

This policy will be reviewed quarterly, with updates and adjustments made as necessary to reflect advancements in AI technology and industry best practices, especially those that impact our commitment to trust, transparency, and ethical considerations.

GUARDRAILS

Human Oversight and Control of AI: Human oversight is essential. AI can technically generate content, but human intent (the essence, emotion, nuance, and ethics) is core to our values as an organization.

- **DO NOT** use AI for the following purposes **unless approved in writing by the CCO or COO**:
  - Generating quotes in editorial content, even in draft form.
  - Automated publication, or distribution of AI-generated or AI-modified content.
  - Autonomous actions (e.g., making editorial, legal, HR, or financial decisions).
  - Voice copying, and/or generation of still or video imagery of real people (alive or dead).
  - Publishing AI language translation of health, science, emergency, legal, or safety-related content without qualified human translator review.
  - Deployment of new agentic AI tools or products based on agentic AI development.
  - AI development involving budgets for tokens (requires COO or CTO approval).
- **DO** feel free to use AI chat tools to:
  - Stimulate and augment brainstorming sessions or eliminate creative blocks.
  - Explore unique story angles or narratives,
  - Provide different perspectives or critiques or help refine existing ideas.
  - Conduct initial research on new topics (treat all research reports as unverified sources).
  - Draft outlines for how information could be organized or content could be structured.
  - Provide editing suggestions (for editorial content, AI should never re-write your words).
  - Optimize content for AI web scraping bots (e.g., bulleted summaries).
- **DO** feel free to use generative art and video tools to:
  - Visualize concepts, characters or promotional art, storyboard scenes or 'sketch' b-roll.
  - Create assets for onscreen graphics, set or environmental design, and similar supporting elements for video and interactive productions.
  - Create promotional assets that conform to official branding style guides (NOTE: this policy does **not** supersede Art Department standard operating procedures).
  - Technically enhance archival materials and/or primary sources, so long as you do not change the meaning of the historical/archival source.
- **DO** feel free to use generative voice and music tools to:
  - Provide scratch track narration.
  - Generated automated transcripts, language translation, and accessibility enhancements.
  - Create audio sketches for soundtrack or score development.
- **DO** feel free to use generative coding tools to:
  - Prototype new game concepts and/or interactive data visualizations.
- **NOTE**: use of agentic AI tools requires:
  - Clear definition of each prospective agent's scope, including explicit objectives, allowable sources, and boundaries for exploration or decision-making.
  - Continuous human oversight, meaning regular monitoring of agent activity and outputs to ensure alignment with ethical standards, accuracy, and organizational values.
  - Immediate staff access to pause or redirect an agent's activities to mitigate potential errors or unintended behaviors.
  - A feedback mechanism for consumers to report hallucinations or other poor responses (especially when used for NPM-developed or licensed chatbot experiences).

ACCOUNTABILITY AND TRANSPARENCY STANDARDS

Evaluating Bias and Source Integrity: While AI can aid in content creation, human judgment ensures that content aligns with the organization's values and standards, preventing unintentional spread of misinformation, stereotypes, or reinforcement of societal and cultural biases that lead to marginalization and discrimination.

- All journalistic content generated or influenced by AI should undergo rigorous fact checking, in line with PBS and NPR Editorial Standards.
- When using generative AI tools, assume that outputs are only loosely accurate or are biased
- Validate, verify, and ensure the accuracy and appropriateness of AI's contributions to content, and ensure that the original message, context, and factual accuracy of sources are not compromised by AI contributions to content.
- Avoid presenting AI-augmented content if biases could lead to misinterpretation.
- Always validate and verify agentic AI outputs against diverse data sets.
- AI trained or fine-tuned by NPM must utilize diverse and inclusive datasets to mitigate bias
- Research any new AI tool before extensive use in production to inform required conversations with the executive producer, then the Chief Content Officer or Chief Innovation Strategist.
- Understand potential shortcomings of models and tools through 3rd-party reporting, experimentation, and feedback internal and external groups regarding potential blind spots.

Transparency & Disclosure: It's essential for our audience to know when a creator has used AI tools in creating *editorial* content (as distinct from corporate communications content, like press releases). AI transparency informs our audience of the origins and methods behind our editorial content, and should be treated as credits or citations, not disclaimers.

- **Asset Provenance**: Synthetic media can be indistinguishable from reality, thus protecting the "chain of custody" for our digital files is critical to defending our public trust. We must be able to prove the authenticity of our original visual journalism and rigorously vet any external imagery.
    - **Rigorous Visual Verification:** Given the rise of gAI tools, our editors and journalists must be vigilant when analyzing third-party or reader-submitted visual content. Media verification must never rely on a single tool; if possible, staff should use a multi-layered forensic approach, combining metadata checks and traditional source verification.
- **External Disclosure**: When AI-generated content appears in editorial output, disclosure must clearly (in plain language) communicate the name, version, use, and influence of the tool and/or agent involved. AI use requires heightened review, and disclosures must be more prominent, when AI has materially influenced reporting on health, science, politics, or emergencies. And where possible, disclosures should link to this policy so as to build audience media literacy.
    - **Chatbots and Virtual Agents:** We must be fully transparent whenever our audience is communicating directly with an AI system (not a human).
        - For public-facing AI experiences the interface must clearly and prominently disclose to the user that they are interacting with AI.
        - The disclosure must briefly explain the purpose of the AI tool (e.g., "This AI assistant is designed to help you quickly find content").
        - **I**nteractive AI systems should always offer audiences a clear, accessible pathway to escalate their inquiry or feedback to a human NPM representative.
    - **Agentic Use**: Include disclosure somewhere in the UI of the product influenced.
        - If agents used gAI as a part of the workflow, note both agentic and gAI use.
    - **Generative Text Content**: In articles, reports, or any written content, include a footnote, endnote, or parenthetical statement specifying when and where material parts of the content were impacted by AI.
        - Using AI for inspiration and/or ideation would not require citation.
    - **Generative Image Content**: For images, include a caption and, digitally, alt-text, and onscreen where AI was used for technical restoration of primary source images
    - **Generative Audio Content**: Include a brief verbal citation at the beginning or end of the segment or of a show where generative audio tools were used, and an onscreen citation for video where AI was used for technical restoration of primary audio sources
    - **Generative Video Content**: Use on-screen text in the timeline where generative imagery or video is used, and where AI was used for technical restoration of primary sources.
        - Cite generative music and voices, images and video in closing credits.
- **Internal Disclosure**: Use of AI tools should not be a secret. And especially for editorial staff, your use of AI-enhanced content or outputs, and the extent of AI's involvement in the finished product usage (especially in situations where agentic AI employs gAI to achieve its objectives) must be approved by the executive producer and Chief Content Officer.

DIGITAL SECURITY REQUIREMENTS

Additionally, always follow digital security best practices (especially when using AI tools and agents):

- **Free is Never "Free"**: Be wary of free versions of AI tools available on the web and research terms of service before accepting them (e.g., use AI tools to help you assess the TOS). If a product is free, then you (i.e. your data) are the product being sold.
- **Use the Cloud**: Use established reputable cloud platforms that are compliant with industry security standards. You may not download AI software to run on Nebraska Public Media-administered machines without Leadership Team and IT approval.
- **Don't Share Passwords**: Under no circumstances should Nebraska Public Media-specific network or system credentials be shared on open networks or with external entities. Use two-factor authentication (2FA) on any platform when offered. Only access Nebraska Public Media specific systems and data that needs to be shared from those systems over Nebraska Public Media's Remote Access VPN.
- **Principle of Least Privilege**: When using API keys, consult the CTO and only grant the minimum permissions necessary to perform the required tasks.
- **Encrypt Data Transmission**: Encrypt at rest and encrypt in transit. When encryption is available, ensure any data used to train, fine-tune, or configure the model is encrypted
- **Think Before you Share**: AI platforms control any information or data that you enter. Do not share any proprietary company information or sensitive data through AI tools. Be aware of the personal information you share about yourself that might be stored as AI "memories."
- **Cleanse Account Memories:** Many commercial AI platforms utilize "macro-context" memory features that inject permanent user facts into new chat sessions. Staff should regularly review (and if necessary, edit) these memories to prevent the trapping of sensitive data.
- **Anonymize Personal Data**: Effectively anonymize any personal information used in prompts. Never upload any proprietary, sensitive, or confidential information (especially information about our users or donors) to public AI platforms or agentic AI services. **And note that use of organizational, supporter, and/or audience data is subject to NPM's data/privacy policy.**
- **Opt-Out of Data Training:** For all paid and approved AI accounts, staff must actively adjust their platform settings to prohibit their inputs, chats, and data from being used to train the developer's foundation models.
- **Avoid Vibe Coding**: Vibe coded applications carry significant potential security and financial risks, not to mention the risk of a poor user experience. Vibe coding, or any other generative coding tools should only be used by or under the supervision of trained software developers.
- **IT Has the Final Say**: IT will assess AI tool usage to identify vulnerabilities and to ensure compliance with industry standards and will conduct rigorous procurement review of AI vendor Terms of Service with an eye toward safeguards for intellectual property, confidentiality, and data security.

APPENDIX A - GUIDELINES FOR FREELANCERS AND THIRD-PARTY CONTRIBUTORS

- **Human-in-the-Loop:** All writing and visuals that freelancers submit to Nebraska Public Media must be the product of human creativity and craft, consisting solely of their original reporting, writing, and work. Freelance contributors who use generative AI as a part of their workflow must disclose that use to their Nebraska Public Media editor/producer, and any media that uses generative AI in its creation or editing should be watermarked with C2PA or SynthID credentials.

- **Pre-Approval Disclosure:** We hold our external contributors to the same high standards of transparency and human oversight as our internal staff. Any proposed use of AI tools must be submitted in a proposal and explicitly approved by the Chief Content Officer or their designee before the freelancer utilizes it in their workflow. We do not accept retroactive disclosures.

- **Plagiarism Checks**: As with any content submitted for editorial review by NPM staff, written content may be subject to a plagiarism and originality review.

- **Protecting Unpublished Material:** Freelancers must adhere to the same stringent data privacy and "digital wall" standards as our newsroom. External contributors are explicitly forbidden from inputting any unpublished material, confidential reporting, interview transcripts, drafts, or source information into free third-party AI tools. They are also forbidden from inputting such materials into paid third-party AI tools without express written permission from the Nebraska Public Media News Director (or their designee), Director of Television & Digital Production, or Chief Content Officer contingent upon contributor confirmation that the accounts used do not permit use of content to train the parent company's model.

- **Work-for-Hire + Underwriting Spots**: The use of AI tools for production projects in which NPM is contracted on a work-for-hire basis, and the use of AI in underwriting spots produced outside the organization are not subject to this policy.

APPENDIX B - ENVIRONMENTAL IMPACT AND SUSTAINABLE AI USAGE

As an organization committed to an informed use of technology, we must recognize that generative and agentic AI tools – like all tools used in 21st-century media creation and distribution workflows – carry an ecological footprint. Specifically, deploying generative media and utilizing agentic AI involves higher-compute and thus more intensive use of resources than traditional digital tools and tasks.

To ensure our technological advancement accounts for environmental impacts where practical, Nebraska Public Media staff should be guided by the following principles of mindful AI use:

- **Match the Tool to the Task (Right-Sizing):**
  - Defaulting to massive, general-purpose foundation models for simple tasks is highly inefficient. Using small, purpose-built models (e.g. OpusClip) for basic functions uses less energy than relying on a general-purpose LLM.
  - Use traditional search engines for basic fact-finding or navigation. If you are only looking for a quick link or basic fact, you can append "-ai" to your Google search to opt out of the energy-intensive AI Overview.
  - Choose lighter "fast" model versions (e.g., GPT-4o-mini or Claude 3.5 Haiku) for everyday administrative tasks, reserving the heaviest, most advanced models only for complex, highly nuanced work.
- **Reserve "Reasoning" and "Agentic" Modes for High-Value Tasks:**
  - Advanced models that execute multi-step internal logic loops (such as "thinking" modes or autonomous research agents) cause energy and water consumption to skyrocket.
  - Turn off "thinking" toggles for straightforward tasks and only deploy agentic AI when the complexity of the objective truly warrants the environmental cost.
  - Ask AI to help you craft Deep Research queries. Using a "fast" model to help with prompt engineering can help reduce your overall energy usage by helping you take better aim as your research target; using less agentic AI time for 'rabbit-hole' research.
- **Be Highly Intentional with "Heavy" Media:**
  - Image generation uses significantly more energy than text generation, and video generation is currently the most computationally expensive task of all.
  - Think of AI generation like a physical resource (e.g. paper). Apply the same intentionality to using AI as you would to printing a 50-page document in full color.
  - Do not automate the production of content simply because the barrier to creation is low; always ensure the output serves a clear, mission-aligned purpose.
  - Spend more time crafting a highly specific, detailed prompt upfront (and use more efficient AI models to help you) to achieve the desired result on the first or second attempt, rather than regenerating dozens of 'slot machine' variations.
- **Optimize Your Prompts for Efficiency:**
  - Provide clear context and instructions to reduce the likelihood of hallucinations or irrelevant answers, saving you from needing an iterative prompting thread
  - The length of the text the AI has to process (input) and write (output) directly impacts the energy it consumes. Adjust settings and/or ask for concise outputs.
    - E.g. Explicitly instruct the AI to "keep the response under 100 words" or "provide only the three main takeaways"

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