Artificial Intelligence in the Review Process

DFG Guideline, will apply from April 16, 2026

Albrecht Schmidt, LMU Munich

Previously: **AI in Proposal Preparation**

DFG Deutsche Forschungsgemeinschaft

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Press Release No. 39 | 21 September 2023

AI and ChatGPT in Science and the Humanities – DFG Formulates Guidelines for Dealing with Generative Models for Text and Image Creation

Statement issued by the Executive Committee / Good research practice as a guideline / Usage to be disclosed transparently / Permissible in funding proposals but not in reviews

https://www.dfg.de/en/service/press/press-releases/2023/press-release-no-39

September 2023

Previously: **AI in Proposal Preparation**

"The **use of artificial intelligence (AI) is generally permitted** when preparing a funding proposal. In the review, evaluation and decision-making process, **the use of AI does not affect how a proposal is assessed**. The **sole deciding factors are the scientific quality** [...]

If, in preparing your proposal, you used AI in the form of generative models for text and image creation, please **disclose** this fact **in a scientifically appropriate manner** in your proposal."

https://www.dfg.de/en/basics-topics/digital-topics/ai/proposals

AI in the Review Process

"The **DFG permits the use of artificial intelligence (AI) in the preparation of reviews**. However, such use is only permitted **subject to clearly defined conditions, which are set out in a guideline**. Reviewers may use AI systems for support purposes at individual stages of their work, for example in structuring their own notes, editing language and screening publicly available literature. **However, the academic analysis, evaluation and recommendation remain the responsibility of the reviewer**."

https://www.dfg.de/en/basics-topics/digital-topics/ai/review

Guideline on the Use of Artificial Intelligence in the Review Process

“This usage and transparency guideline aims to establish a framework for reviewers using AI systems in the review process so as to ensure that AI systems are used in a way that is responsible, transparent and – with regard to legislation such as the AI Act (EU) 2024/1689, the General Data Protection Regulation (GDPR) and the German Copyright Act (UrhG) – **legally compliant.**

Responsibility for the content of the review remains with the reviewer.”

https://www.dfg.de/resource/blob/390262/4-04-en.pdf

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Make legal what people do anyway

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Guideline on the Use of Artificial Intelligence in the Review Process

Purpose of use

Human analysis and the expert assessment of the proposal are core elements of the review process. The use of AI systems in the preparation of reviews is therefore permitted only in a supporting capacity. **All substantive judgements regarding the funding recommendation rest solely with the reviewer**.

https://www.dfg.de/resource/blob/390262/4-04-en.pdf

Guideline on the Use of Artificial Intelligence in the Review Process

Purpose of use

For example, an AI system may be used to **identify relevant literature** relating to the proposal under review, to turn reviewers' own **keywords or notes** – from which the intended direction of the review is already clearly apparent – into a fully formulated text, or to provide **suggestions for structural or linguistic revision of the reviewer's own ideas**. However, it is **not permissible** to have substantial parts of the review **generated automatically and without reflection**, i.e. without independent expert assessment.

https://www.dfg.de/resource/blob/390262/4-04-en.pdf

Guideline on the Use of Artificial Intelligence in the Review Process

1. Confidentiality

AI systems may be used only where care is taken to **ensure that confidential content of funding proposals** is not processed without oversight, stored, or used for purposes other than the conduct of the review process. The supportive use of AI in drafting a review must not result in the disclosure of confidential proposal content. This information is entrusted to the DFG exclusively for the purpose of review, evaluation and decision-making.

https://www.dfg.de/resource/blob/390262/4-04-en.pdf

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In particular in the case of cloud-based AI systems, subsequent processing for training purposes may occur when data is entered. This is not covered by the original purpose for which the information was provided by the applicants and is therefore not permitted.
For this reason, reviewers may input proposal content into AI systems only if care is taken to ensure that the provider of the AI system does not store the proposal content permanently or beyond the specific purpose of use.
One of the following requirements must therefore be met:

- *The AI system must be installed on the reviewer's own device and processing must take place exclusively on that device, without cloud computing or the transfer of processing results to the cloud.*
- *The AI system must be hosted by a trustworthy institution (e.g. a university or public research institution).*
- *Cloud-based non-commercial or commercial AI systems (e.g. ChatGPT, Claude, Gemini) may be used only where a contractual licence agreement guarantees data security and excludes use of the input data by the provider (e.g. for training purposes), and where these conditions are actively set by means of the appropriate security settings (e.g. "no logging"; "no storage").*
- *The recommendation is that AI systems should be used which are based on transparently documented and publicly available AI models with publicly accessible training data.*

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Guideline on the Use of Artificial Intelligence in the Review Process

Confidentiality

AI systems may be used only where care is taken to ensure that confidential content of funding proposals is not processed without oversight, stored, or used for purposes other than the conduct of the review process. The supportive use of AI in drafting a review must not result in the disclosure of confidential proposal content. This can be ensured by using the following types of system:

1. Locally hosted systems without cloud computing
2. Systems hosted by a trustworthy institution (e.g. a university or public research institution)
3. Cloud-based (commercial) systems subject to a contractual licence agreement guaranteeing data security

https://www.dfg.de/en/basics-topics/digital-topics/ai/review#389620

Guideline on the Use of Artificial Intelligence in the Review Process

2. Transparency

If an AI system is used in preparing the review, **this must be disclosed, specifying the purposes of use**.

> The use of the AI system can be described in a few explanatory sentences. Specific marking of the review passages in question is not required. “Disclosure” here means stating which of the permissible purposes listed above the AI system was used for and to what extent. AI tools that do not affect the substance of the review (e.g. grammar, style or spelling checks, translation tools) need not be disclosed.

https://www.dfg.de/resource/blob/390262/4-04-en.pdf

Guideline on the Use of Artificial Intelligence in the Review Process

3. Quality assurance

Uncritical adoption of AI-generated text is not permitted. AI-generated text must always be critically assessed, adapted and checked for factual accuracy, currency and potential bias structures.

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Since generative AI models are based on probabilistic methods, they may produce factually incorrect, unbalanced or biased content. The models are trained on publicly available data and use probabilistic calculations to reflect social, cultural and also academic discourses without taking an academically substantiated position of their own. As a result, they perpetuate bias contained in the training data, including gender and diversity bias, for example. With regard to the processes of knowledge acquisition by research, they may evaluate concepts that build on established approaches more positively than novel research approaches that could lead to paradigm shifts (status quo bias). Overall, generative AI may produce inaccurate or distorted content. Without critical human control, the scientific quality of the review and the integrity of the DFG review system are at risk. Seemingly coherent AI-generated text may also give rise to automation bias.

https://www.dfg.de/resource/blob/390262/4-04-en.pdf

Guideline on the Use of Artificial Intelligence in the Review Process

4. Responsibility

Full responsibility for the content of the review lies with the person who prepared it. This applies even where parts of the text were generated with the assistance of AI systems. Responsible expert review requires subject expertise and ethical judgement, which by their very nature AI systems do not possess. **Responsibility must therefore not be transferred to an AI system; it remains with the reviewer**.

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Artificial Intelligence in the Review Process
DFG Position and Perspectives

1. Introduction

The ongoing digital turn is changing science and the humanities in many ways. The development of generative artificial intelligence (AI), in particular so-called large language models (LLMs), is creating new possibilities for information processing, text generation and analysis. These developments are increasingly impacting research funding procedures, especially the review process, which is regarded as the core mechanism for quality assurance within the DFG's funding system.

Against this background, the DFG has carried out an in-depth examination of the role and potential use of AI in review. In a DFG statement issued in September 2023, the use of AI in the review process was initially ruled out in order to establish clear conditions and provide procedural certainty in relation to this rapidly evolving technology. As announced, a comprehensive reassessment was carried out between 2023 and 2025, based in part on close monitoring of ongoing developments. The aim was to analyse opportunities and risks, clarify legal and ethical frameworks and maybe come to a responsible basis for the use of AI in review.

This white paper summarises that process of clarification. It outlines the development of internal discussions, presents the disciplinary, legal and technical arguments and explains the introduction of the Guideline on the Use of Artificial Intelligence in the Review Process adopted in December 2025.

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2. Background and previous DFG position
3. Development of the discussion within the DFG's statutory bodies
4. Opportunities and potential uses
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6. Guideline on the Use of Artificial Intelligence in the Review Process
7. Outlook and institutional implications
8. Conclusion

Members and permanent guests of the DFG Senate Ad Hoc Working Group on the Digital Turn, 2022–2026

Imprint

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Professor Dr. Kerstin **Schill** (University of Bremen)
DFG Vice President
Dr. Heide **Ahrens**
DFG Secretary General

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The working group thanks the following guests for their keynote contributions:

Dr. Katrin **Frisch**, Ombuds Committee for Research Integrity in Germany (OWID), Professor Dr. Iryna **Gurevych**, Technical University of Darmstadt – Computer Science Department, Ubiquitous Knowledge Processing Lab, Professor Dr. Andreas **Hotho**, Julius-Maximilians-Universität, Würzburg – Institute of Computer Science, Data Science Chair, Professor Dr. Thomas **Kosch**, Humboldt University of Berlin – Department of Computer Science, Dr. Anne K. **Krüger**, Weizenbaum-Institut e.V., Professor Dr. Lea Katharina **Kumkar**, University of Trier – Faculty V, Junior Professorship of Civil Law, Commercial Law and Legal Issues of Digitalisation, Professor Dr. Malte **Persike**, RWTH Aachen University, Center for Teaching and Learning Services, Professor Dr. Martin **Reinhart**, Humboldt University of Berlin – Robert K. Merton Center for Science Studies (RMZ)

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Guideline on the Use of Artificial Intelligence in the Review Process

Could this be a blueprint for reviewing and marking in the university context?

- Seminar papers
- Practical work reports
- Master and Bachelor thesis
- PhD thesis reviews
- Habilitations
- …