

# Convergence of Sharpness-Aware Minimization

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Google Research and UC Berkeley

IHP  
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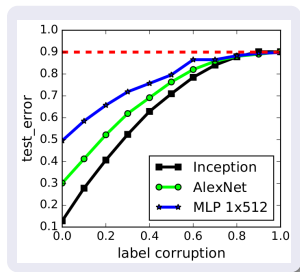
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- This talk: optimization for non-linear and high-dimensional prediction
  - 1 Benign overfitting in a non-linear setting
  - 2 'Sharpness-Aware Minimization'

# Overfitting in Deep Networks



(Zhang, Bengio, Hardt, Recht, Vinyals, 2017)

- Deep networks can be trained to zero training error (for *regression* loss)
- ... with near state-of-the-art performance
- ... even for *noisy* problems.
- No tradeoff between fit to training data and complexity!
- *Benign overfitting*.

also (Belkin, Hsu, Ma, Mandal, 2018)

## Intuition

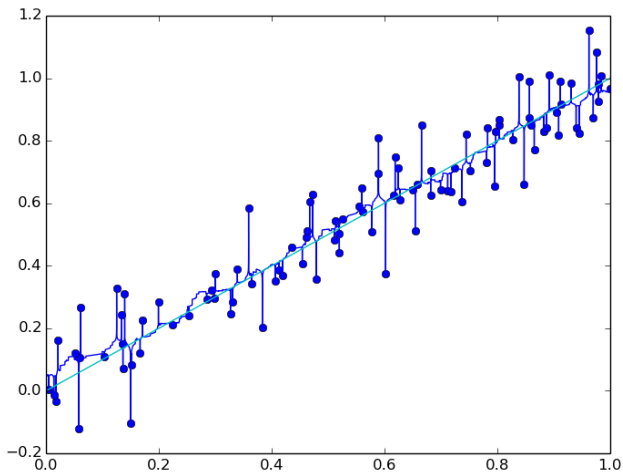
- Benign overfitting prediction rule  $\hat{f}$  decomposes as

$$\hat{f} = \hat{f}_0 + \Delta.$$

- $\hat{f}_0$  = simple component useful for *prediction*.
- $\Delta$  = spiky component useful for *benign overfitting*.
- Classical statistical learning theory applies to  $\hat{f}_0$ .
- $\Delta$  is not useful for prediction, but it is benign.

(Deep learning: a statistical viewpoint. B., Montanari, Rakhlin. *Acta Numerica*. 2021)

# Benign Overfitting



## Linear Regression

(B, Long, Lugosi, Tsigler, 2019), (B, Tsigler, 2020)

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$$\hat{f} = \hat{f}_0 + \Delta.$$

- $\hat{f}_0 =$  *prediction* component:  
 $k^*$ -dim subspace corresponding to  $\lambda_1, \dots, \lambda_{k^*}$ .
- $\Delta =$  *benign overfitting* component:  
orthogonal subspace.  $\Delta$  is benign only if  $R_{k^*} \gg n$ .

Here,

$\lambda_1, \lambda_2, \dots$  are the eigenvalues of the covariate covariance,  
 $k^*$  is defined in terms of an effective rank of the covariance in the  
low-variance orthogonal subspace, and  
 $R_{k^*}$  is another effective rank in that subspace.

- Benign overfitting in classical settings:
  - **Kernel smoothing** [Belkin, Hsu, Mitra, 2018; Belkin, Rakhlin, Tsybakov, 2018; Chhor, Sigalla, Tsybakov, 2022; ...]
  - **Linear regression** [Hastie, Montanari, Rosset, Tibshirani, 2019; Bartlett, Long, Lugosi, Tsigler, 2019; Bartlett, Tsigler, 2020; Koehler, Zhou, Sutherland, Srebro, 2021; ...]
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## Outline

- Noisy classification with two-layer neural networks trained by GD

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## Outline

- Noisy classification with two-layer neural networks trained by GD
- Benign overfitting
- Proof ideas

# Goal and technical challenges

## Goal

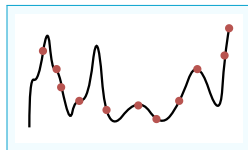
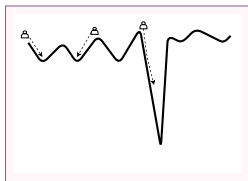
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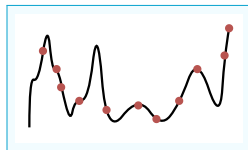
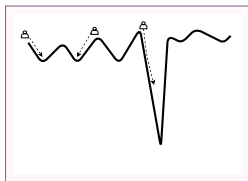
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Understand how benign overfitting can occur in *neural networks trained by gradient descent* to get insight into 'modern' ML.

Technical challenges:



- Understand non-convex learning dynamics of neural network training.
- Understand generalization of interpolating classifiers for noisy data when hypothesis class has unbounded capacity.

# Distributional setting

- Mixture of two log-concave isotropic clusters:
  - Cluster centered at  $+\mu \in \mathbb{R}^p$ , clean label  $+1$
  - Cluster centered at  $-\mu \in \mathbb{R}^p$ , clean label  $-1$
- Allow for constant fraction  $\eta$  of training labels to be flipped ( $\tilde{P}_{\text{cl}}$ : 'clean' distribution,  $P_{\text{ns}}$ : 'noisy' distribution)
- Assume  $\|\mu\|$  grows with dimension  $p$ .

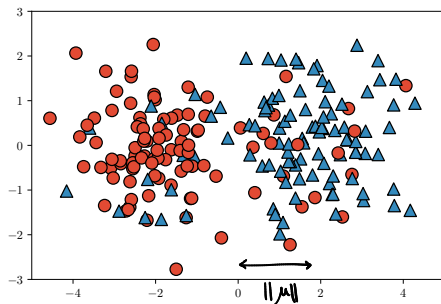
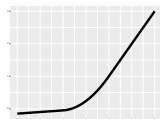


Figure:  $P_{\text{clust}} = N(0, I_2)$  with  $\|\mu\| = 1.9$  and 15% of the labels flipped.

# Model and optimization definitions

- We consider  $\gamma$ -leaky,  $H$ -smooth activations  $\phi$ , satisfying for all  $z \in \mathbb{R}$ ,

$$0 < \gamma \leq \phi'(z) \leq 1, \quad |\phi''(z)| \leq H.$$



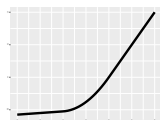
Two-layer neural networks trained by GD



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## Two-layer neural networks trained by GD

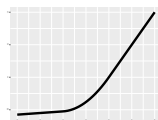
- Network with  $m$  neurons, first layer weights  $W \in \mathbb{R}^{m \times p}$ , second layer weights  $\{a_j\}_{j=1}^m$  (fixed at initialization),

$$f(x; W) := \sum_{j=1}^m a_j \phi(\langle w_j, x \rangle).$$

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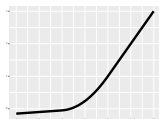
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- Initialize  $[W^{(0)}]_{r,s} \stackrel{\text{i.i.d.}}{\sim} \mathcal{N}(0, \omega_{\text{init}}^2)$ ,  $a_j \stackrel{\text{i.i.d.}}{\sim} \text{Unif}(\{1/\sqrt{m}, -1/\sqrt{m}\})$ .

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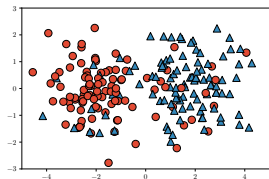
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- For  $\ell(z) = \log(1 + \exp(-z))$ , data  $\{(x_i, y_i)\}_{i=1}^n \stackrel{\text{i.i.d.}}{\sim} \mathcal{P}_{\text{ns}}$ ,  $\alpha > 0$ ,

$$W^{(t+1)} = W^{(t)} - \alpha \nabla \widehat{L}(W^{(t)}) = W^{(t)} - \alpha \nabla \left( \frac{1}{n} \sum_{i=1}^n \ell(y_i f(x_i; W^{(t)})) \right).$$

# The setting

For failure probability  $\delta \in (0, 1)$ , large  $C > 1$ :

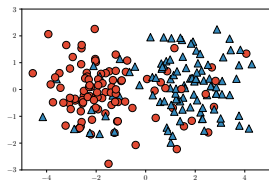


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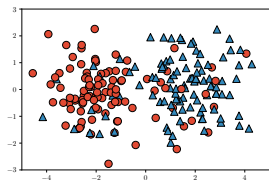
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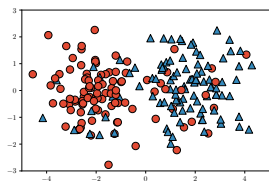


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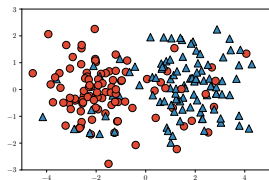


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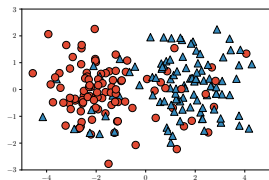
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- Networks of arbitrary width  $m \geq 1$ .

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For  $C > 1$  large enough under Assumptions (A1) through (A5):

## Theorem

(Frei, Chatterji, B, 2022)

For  $0 < \varepsilon < 1/2n$ , by running GD with stepsize  $\alpha$ , for  $T \geq C\alpha^{-1}\varepsilon^{-2}$  iterations, with high probability over the random initialization and sample:

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- Any width  $m \geq 1$ : no dependence on  $m$  (except  $\alpha \geq \omega_{\text{init}}\sqrt{mp}$ ).

# Benign overfitting and uniform convergence

## Theorem

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For  $0 < \varepsilon < 1/2n$ , by running GD with l.r.  $\alpha$ , for  $T \geq C\alpha^{-1}\varepsilon^{-2}$  iterations, w.h.p. over the random initialization and sample:

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- As  $\varepsilon \rightarrow 0$ ,  $\|W^{(T)}\| \rightarrow \infty$ .
- Predictor has **unbounded norm**, neural net can be **arbitrarily wide**, achieves  $\approx 0$  training loss, generalizes near-optimally — Bayes error  $\geq \eta = \Omega(1)$ .
  - Many ways to overfit:  $p \gg n$ , width  $\gg 1, \dots$

# Proof outline

By strong log-concavity, suffices to derive normalized margin bound:

## Lemma

Suppose that  $\mathbb{E}_{(x, \tilde{y}) \sim \tilde{P}_{cl}} [\tilde{y} f(x; W)] \geq 0$ . Then there exists a universal constant  $c > 0$  such that

$$\mathbb{P}_{(x, y) \sim P_{ns}} (y \neq \text{sgn}(f(x; W))) \leq \eta + 2 \exp \left( -c \left( \frac{\mathbb{E}_{(x, \tilde{y}) \sim \tilde{P}_{cl}} [\tilde{y} f(x; W)]}{\|W\|_F} \right)^2 \right)$$

# Proof outline

By strong log-concavity, suffices to derive normalized margin bound:

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- Benign overfitting occurs if we can show:
  - 1 Normalized margin on *clean* points is large:

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- 2 Empirical risk can be driven to zero:

$$y_i = \text{sgn}(f(x_i; W^{(T)})) \text{ for all } i, \text{ and } \hat{L}(W^{(T)}) \approx 0.$$

# Gradient descent ensures good generalization performance

## Lemma

For any  $t \geq 1$ , for a step size large relative to random initialization,

$$\mathbb{E}_{(x, \tilde{y}) \sim \tilde{P}_{\text{cl}}} \left[ \frac{\tilde{y} f(x; W^{(t)})}{\|W^{(t)}\|_F} \right] \gtrsim \sqrt{np^{1/3}} \gg 0,$$

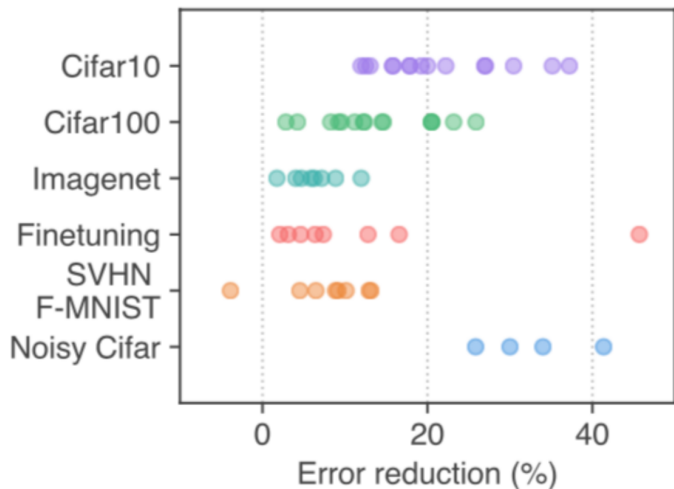
$$\mathbb{P}_{(x, y) \sim P_{\text{ns}}} (y \neq \text{sgn}(f(x; W^{(t)}))) \leq \eta + 2 \exp(-c \cdot np^{1/3}).$$

- Gradient descent produces a particular neural network which will classify well, regardless of  $\|W^{(t)}\|_F$ , with sub-polynomial samples.

## Optimization for high-dimensional prediction

- 1 Benign overfitting in a non-linear setting
- 2 'Sharpness-Aware Minimization'

# Sharpness-Aware Minimization: Prediction Performance



# Sharpness-Aware Minimization

*Sharpness-Aware Minimization for Efficiently Improving Generalization.*  
Pierre Foret, Ariel Kleiner, Hossein Mobahi, Behnam Neyshabur. ICLR21.



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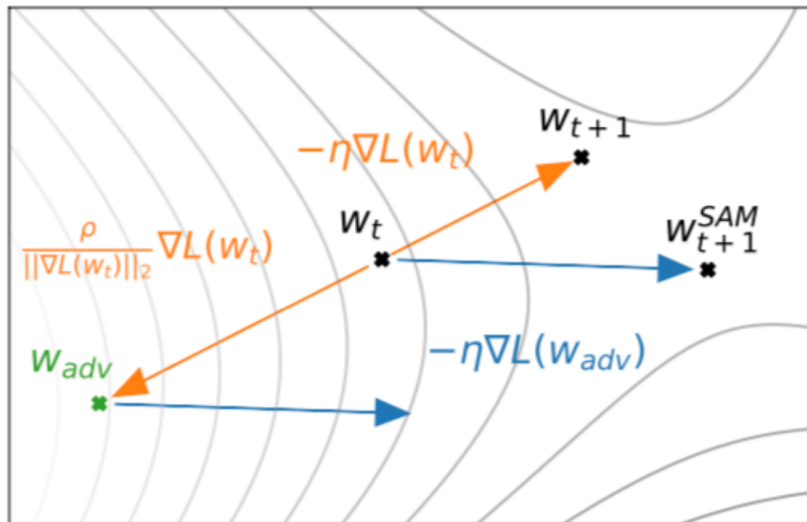
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- The reality: First order simplification:

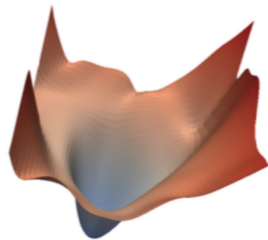
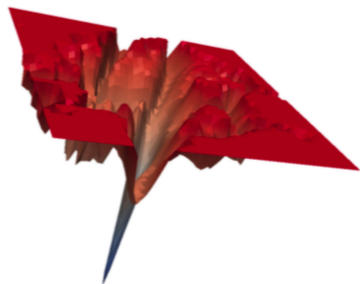
$$w_{t+1} = w_t - \eta \nabla \ell \left( w_t + \rho \frac{\nabla \ell(w_t)}{\|\nabla \ell(w_t)\|} \right).$$

# Sharpness-Aware Minimization



# Visualizing SAM Minima

## ResNet trained with SGD versus SAM



Foret, Kleiner, Mobahi, Neyshabur. 2021

# Convergence of Sharpness-Aware Minimization



Phil Long



Olivier Bousquet

- The dynamics of sharpness-aware minimization: bouncing across ravines and drifting towards wide minima. B., Long, Bousquet. arXiv:2210.xxxxx

## Outline

# Convergence of Sharpness-Aware Minimization



Phil Long



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## Outline

- SAM with a quadratic criterion: Bouncing across ravines
  - Stationary points
  - A non-convex gradient descent
  - SAM oscillates around minimum

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  - Descending the gradient of the spectral norm of the Hessian



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# SAM with a quadratic criterion

## SAM

For a loss function  $\ell : \mathbb{R}^d \rightarrow \mathbb{R}$ , SAM starts with an initial parameter vector  $w_0 \in \mathbb{R}^d$  and updates

$$w_{t+1} = w_t - \eta \nabla \ell \left( w_t + \rho \frac{\nabla \ell(w_t)}{\|\nabla \ell(w_t)\|} \right).$$

where  $\eta, \rho > 0$  are step size parameters.

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## SAM with quadratic loss

Fix  $\Lambda = \text{diag}(\lambda_1, \dots, \lambda_d)$  with  $\lambda_1 \geq \dots \geq \lambda_d \geq 0$  and consider loss

$$\ell(w) = \frac{1}{2} w^\top \Lambda w.$$

Then  $\nabla \ell(w) = \Lambda w$  and  $w_{t+1} = \left( I - \eta \Lambda - \frac{\eta \rho}{\|\Lambda w_t\|} \Lambda^2 \right) w_t$ .

## Theorem

(B., Long, Bousquet, 2022)

There is an absolute constant  $c$  such that for any eigenvalues  $\lambda_1 > \lambda_2 \geq \dots \geq \lambda_d > 0$ , any neighborhood size  $\rho > 0$ , and any step size  $0 < \eta < \frac{1}{2\lambda_1}$ , for all small enough  $\epsilon, \delta > 0$ , if  $w_0$  is sampled from a continuous probability distribution over  $\mathbb{R}^d$  (density bounded above by  $A$ ;  $\|w_0\|$  not too big;  $|w_{0,1}|$  not too small), then with probability  $1 - \delta$ , for all  $t$  sufficiently large (polynomial in  $d$ ,  $1/(\eta\lambda_d)$ ,  $\lambda_1/\lambda_d$  and  $1/(\lambda_1^2/\lambda_2^2 - 1)$ , polylogarithmic in other parameters), for some

$$w^* \in \left\{ \pm \frac{\eta\rho\lambda_1}{2 - \eta\lambda_1} e_1 \right\}$$

and for all  $s \geq t$ ,  $\|w_{2s} - w^*\| \leq \epsilon$  and  $\|w_{2s+1} + w^*\| \leq \epsilon$ .

# SAM with a quadratic criterion

## A reparameterization

Define  $v_t = \nabla \ell(w_t) = \Lambda w_t$ . Then

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so, for all  $i$  and all  $t$ , we have

$$\begin{aligned} v_{t+1,i} &= \left( 1 - \eta \lambda_i - \frac{\eta \rho \lambda_i^2}{\|v_t\|} \right) v_{t,i} \\ &= (1 - \eta \lambda_i) \left( 1 - \frac{\gamma_i}{\|v_t\|} \right) v_{t,i}, \end{aligned}$$

where  $\gamma_i := \frac{\eta \rho \lambda_i^2}{1 - \eta \lambda_i}$ .

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Nonlinear recurrence, but coupled only by  $\|v_t\|$ .

# SAM with a quadratic criterion

Define  $\beta_i = \frac{1 - \eta\lambda_i}{2 - \eta\lambda_i} \gamma_i = \frac{\eta\rho\lambda_i^2}{2 - \eta\lambda_i}$ .

Solutions are in the eigenvector directions,  $\beta_i$  from the minimum

The set of non-zero solutions  $(v_1^2, \dots, v_d^2)$  to  $\forall i, v_{t+1,i}^2 = v_{t,i}^2$  is

$$\bigcup_{i=1}^d \text{co}\{\beta_i^2 \mathbf{e}_j : \beta_j = \beta_i\},$$

where  $\text{co}(S)$  denotes the convex hull of a set  $S$  and  $\mathbf{e}_j$  is the  $j$ th basis vector in  $\mathbb{R}^d$ .



## SAM with a quadratic criterion

Define  $\alpha_j = \frac{(1 - \eta\lambda_1)\gamma_1 + (1 - \eta\lambda_j)\gamma_j}{1 - \eta\lambda_1 + 1 - \eta\lambda_j}$ .

Recall  $\beta_j = \frac{1 - \eta\lambda_j}{2 - \eta\lambda_j}\gamma_j$ .

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If  $\lambda_1 > \lambda_2$ , then  $\beta_d \leq \dots \leq \beta_1 < \alpha_d \leq \dots \alpha_2 \leq \alpha_1 = \gamma_1$ .

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Norm of  $v$  versus  $\beta_i$  determines how components grow

$\|v_t\| > \beta_i$  iff  $v_{t+1,i}^2 < v_{t,i}^2$ .

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Norm of  $v$  versus  $\alpha_i$  determines relative growth

$$\text{If } \lambda_1 > \lambda_2, \text{ then for } i \in \{2, \dots, d\}, \|v_t\| < \alpha_i \text{ iff } \frac{v_{t+1,1}^2}{v_{t+1,i}^2} > \frac{v_{t,1}^2}{v_{t,i}^2}.$$

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Define  $b = (1 - \eta\lambda_1)\gamma_1$ .

$\|v_t\| \leq b$  implies  $\|v_{t+1}\| \leq b$  (and the decay to  $b$  is exponentially fast).

# A non-convex gradient descent

## Lemma

For  $u_t := (-1)^t w_t$ , if  $\|w_t\| > 0$ ,

$$u_{t+1} = u_t - \eta \rho \nabla J(u_t),$$

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$$J(u) = \frac{1}{2} u^\top C u - \|\Lambda u\|, \quad C = \text{diag} \left( \frac{\lambda_1^2}{\beta_1}, \dots, \frac{\lambda_d^2}{\beta_d} \right).$$

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Also,

$$J(u_{t+1}) - J(u_t) \leq -\frac{1}{2\rho} \sum_{i=1}^d u_{t,i}^2 \left( 1 - \frac{\beta_i}{\|\Lambda u_t\|} \right)^2 (2 - \eta\lambda_i)^2 \lambda_i.$$



# A non-convex gradient descent

## Properties of $J$

$\nabla J(u) = 0$  iff for some  $i$ ,  $\|u\| = \beta_i/\lambda_i$  and  $u \in \text{span}\{e_j : \beta_j = \beta_i\}$ .

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$$\nabla^2 J\left(\frac{\beta_i}{\lambda_i} \hat{u}\right) = \Lambda^2 \left( \sum_{j:\beta_j \neq \beta_i} \left(\frac{1}{\beta_j} - \frac{1}{\beta_i}\right) e_j e_j^\top + \frac{1}{\beta_i} \hat{u} \hat{u}^\top \right),$$

which has  $|\{j : \beta_j < \beta_i\}| + 1$  positive eigenvalues,  $|\{j : \beta_j > \beta_i\}|$  negative eigenvalues, and  $|\{j : \beta_j = \beta_i\}| - 1$  zero eigenvalues.

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The set of all stationary points with only non-negative eigenvalues is

$$M = \left\{ u \in \mathbb{R}^d : \|u\| = \frac{\beta_1}{\lambda_1}, u \in \text{span}\{e_j : \beta_j = \beta_1\} \right\},$$

and this is the set of global minima. There are no other local minima.

# A non-convex gradient descent

## Lemma

For  $\epsilon > 0$ , and  $\|v_{T_0}\| \leq b$ ,

$$\left| \left\{ t \geq T_0 : \|v_t\| \geq (1 + \epsilon)\beta_1 \right\} \right| \leq \frac{2}{\eta\epsilon^2\lambda_1\beta_1} \left( \max_{\|w\| \leq b} J(w) - \min_w J(w) \right) \\ \leq \frac{3\beta_1}{\eta\epsilon^2\lambda_1\beta_d}.$$

Recall:

- $\beta_d \leq \dots \leq \beta_1 < \alpha_d \leq \dots \alpha_2 \leq \alpha_1 = \gamma_1$ ,
- Norm of  $v$  versus  $\beta_i$  determines how components grow, and
- Norm of  $v$  versus  $\alpha_i$  determines relative growth compared to the leading component.

## Theorem

(B., Long, Bousquet, 2022)

There is an absolute constant  $c$  such that for any eigenvalues  $\lambda_1 > \lambda_2 \geq \dots \geq \lambda_d > 0$ , any neighborhood size  $\rho > 0$ , and any step size  $0 < \eta < \frac{1}{2\lambda_1}$ , for all small enough  $\epsilon, \delta > 0$ , if  $w_0$  is sampled from a continuous probability distribution over  $\mathbb{R}^d$  (density bounded above by  $A$ ;  $\|w_0\|$  not too big;  $|w_{0,1}|$  not too small), then with probability  $1 - \delta$ , for all  $t$  sufficiently large (polynomial in  $d$ ,  $1/(\eta\lambda_d)$ ,  $\lambda_1/\lambda_d$  and  $1/(\lambda_1^2/\lambda_2^2 - 1)$ , polylogarithmic in other parameters), for some

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## SAM's asymptotic behavior

For some

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- SAM's gradient-based approach leads to oscillations around the minimum.

These oscillations have an impact for a non-quadratic loss.



## Outline

- SAM with a quadratic criterion: Bouncing across ravines
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  - A non-convex gradient descent
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## Locally quadratic objective function

Consider a smooth objective  $\ell$  with a slowly varying ( $B$ -Lipschitz) third derivative:

$$\|D^3\ell(w) - D^3\ell(w')\| \leq B\|w - w'\|.$$

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Consider a local minimum  $w_z \in \mathbb{R}^d$ :

$$\nabla\ell(w_z) = 0, \quad H := \nabla^2\ell(w_z) = \text{diag}(\lambda_1, \dots, \lambda_d),$$

with  $\lambda_1 \geq \dots \geq \lambda_d \geq 0$ .

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with  $\lambda_1 \geq \dots \geq \lambda_d \geq 0$ .

Near  $w_z$ ,  $\ell$  is close to

$$\ell_q(w) = \ell(w_z) + \frac{1}{2}(w - w_z)^\top H(w - w_z).$$

## Locally quadratic objective function

Consider an overparameterized setting, with

$\lambda_1 > \lambda_2 \geq \dots \geq \lambda_k > \lambda_{k+1} = \dots = \lambda_d = 0$  for  $k > 1$ .

Suppose

- $w_0$  satisfies  $e_i^\top (w_0 - w_z) = 0$  for  $i = k + 1, \dots, d$ ,
- SAM is initialized at  $w_0$  and applied to the quadratic objective  $\ell_q$ .

Then for all  $t$ , the condition  $e_i^\top (w_t - w_z) = 0$  for  $i > k$  continues to hold, and SAM converges to the set

$$\left\{ w_z \pm \frac{\beta_1}{\lambda_1} e_1 \right\}.$$

# SAM: Beyond Quadratic

## Locally quadratic objective function

Consider an overparameterized setting, with

$\lambda_1 > \lambda_2 \geq \dots \geq \lambda_k > \lambda_{k+1} = \dots = \lambda_d = 0$  for  $k > 1$ .

Suppose

- $w_0$  satisfies  $e_i^\top (w_0 - w_z) = 0$  for  $i = k + 1, \dots, d$ ,
- SAM is initialized at  $w_0$  and applied to the quadratic objective  $\ell_q$ .

Then for all  $t$ , the condition  $e_i^\top (w_t - w_z) = 0$  for  $i > k$  continues to hold, and SAM converges to the set

$$\left\{ w_z \pm \frac{\beta_1}{\lambda_1} e_1 \right\}.$$

- What is the impact of bouncing over the ravine?

# SAM: Drifting Towards Wide Minima

## Theorem

(B., Long, Bousquet, 2022)

For  $s_t \in \{-1, 1\}$ , consider the point  $w_t = w_z + \frac{s_t \beta_1}{\lambda_1} e_1$

Then, if  $B\eta\rho \leq 1$ , SAM's update on  $\ell$  gives (for some  $\|\zeta\| \leq 1$ )

$$w_{t+1} - w_t = -2 \frac{\eta\rho\lambda_1 s_t}{2 - \eta\lambda_1} e_1 - \frac{\eta\rho^2}{2} \left(1 + \frac{\eta\lambda_1}{2 - \eta\lambda_1}\right)^2 \nabla \lambda_{\max}(\nabla^2 \ell(w_z)) \\ + \eta\rho^2 \left( \frac{(1 + \eta\lambda_1)^3 \rho}{6} + 2(2\lambda_1 + B\rho)\eta \right) B\zeta.$$

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The gradient steps have:

- A component that maintains the oscillation in the  $e_1$  direction,
- A component pointing downhill in the spectral norm of the Hessian,
- For **small** stepsize parameters  $\eta, \rho > 0$ , a smaller component reflecting the change of third derivative.

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  - Near a minimum, SAM descends the gradient of the spectral norm of the Hessian.
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- 
- Statistical benefits of wide global minima of empirical risk?

# Wide global minima of empirical risk?

## Coding/information theory:

- Hinton and van Camp. Keeping the neural networks simple by minimizing the description length of the weights. COLT93.
- Hochreiter and Schmidhuber. Flat minima. Neural Comput. 1997.
- Negrea, Haghifam, Dziugaite, Khisti, Roy. Information-theoretic generalization bounds for SGLD via data-dependent estimates. NeurIPS 2019.
- Neu, Dziugaite, Haghifam, Roy. Information-theoretic generalization bounds for stochastic gradient descent. COLT 2021.



# Wide global minima of empirical risk?

## PAC-Bayes:

- Langford and Caruana. (Not) bounding the true error. NIPS 2002.
- Dziugaite, Roy. Computing nonvacuous generalization bounds for deep (stochastic) neural networks with many more parameters than training data. UAI 2017.

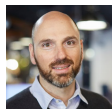
## Nonequilibrium statistical physics:

- Baldassi, Borgs, Chayes, Ingrosso, Lucibello, Saglietti, and Zecchina. Unreasonable effectiveness of learning neural networks: From accessible states and robust ensembles to basic algorithmic schemes. PNAS 2016.
- Chaudhari, Choromanska, Soatto, LeCun, Baldassi, Borgs, Chayes, Sagun, and Zecchina. Entropy-SGD: Biasing gradient descent into wide valleys. ICLR 2017.

## Outline

- SAM with a quadratic criterion: Bouncing across ravines
  - Stationary points
  - A non-convex gradient descent
  - SAM oscillates around minimum
- Beyond quadratic: Drifting towards wide minima
  - SAM near a smooth minimum
  - Descending the gradient of the spectral norm of the Hessian
- Open questions

# Optimization in High-Dimensional Prediction



Olivier Bousquet



Niladri Chatterji



Spencer Frei



Phil Long

- Benign overfitting without linearity: neural network classifiers trained by gradient descent for noisy linear data. Frei, Chatterji, B. COLT 2022  
arXiv:2202.05928
- The dynamics of sharpness-aware minimization: bouncing across ravines and drifting towards wide minima. B., Long, Bousquet. arXiv:2210.xxxxx