

DADM 3rd Review Summary

Fall 2022

Below is a short summary of the issues and changes we are suggesting as part of the 3rd review of the Directive on Automated Decision-Making (DADM). Working in the open, we plan to collaborate with Canadian and international stakeholders to review these issues and consider how best to address them ahead of the policy amendment process.

Issue	Response
<p>Scope: External focus excludes automated decisions impacting federal employees.</p> <p>Language framing the scope requires clarification.</p>	<p>Expand the scope to also apply to internal services.</p> <p>Change wording from “recommend or make an administrative decision” to “make an administrative decision or a related assessment”.</p>
<p>Periodic Review: Current 6-month timeframe for review creates policy and operational challenges.</p>	<p>Change to “every 2 years”, and “as determined by the CIO of Canada” should there be a pressing need for an off-cycle review.</p>
<p>Clients Impacted: Reference to Canadians in some parts of the DADM does not recognize other potential clients.</p>	<p>Replace references to “Canadians” with the term “clients” and supplement the latter with a reference to “Canadian society”.</p>
<p>Data Governance: Quality assurance measures do not address the need to trace, protect, and retain and dispose of data used and generated by a system.</p>	<p>Add a requirement to govern the data used and generated by automated decision systems.</p>
<p>Model Bias: Bias testing measures are limited to data – they do not account for other possible sources of bias such as the model.</p>	<p>Expand the bias testing requirement to cover models, which are a potential source of bias.</p>
<p>Inclusion: Measures supporting intersectional approaches to the design and implementation of systems are lacking.</p>	<p>Require the completion of a GBA+ during the development of a system and an assessment of potential impacts on persons with disabilities.</p>
<p>Explanation: Criteria for what constitutes a meaningful explanation are absent.</p> <p>Approach to publishing explanations is unclear.</p>	<p>Expand the existing requirement to include criteria concerning the role of the system in decision-making, the input data and the processing applied to it, and the output of the system and related information for interpreting it.</p> <p>For explanations addressed to clients, require justifications of the decision.</p> <p>Integrate explanation criteria into the AIA and require public explanations to be discoverable via departmental websites.</p>
<p>Reasons for Automation: A justification for the adoption of AI in relation to user needs and program goals is currently not required.</p>	<p>Add questions to the AIA concerning the user (or public) need that the system is addressing, the effectiveness of the system in meeting that need, and the alternatives considered.</p>
<p>Peer Review: Requirement to publish information about peer reviews is not included.</p> <p>Timing of peer review completion is unclear.</p>	<p>Expand the existing requirement to mandate publication of complete or summarized peer reviews.</p> <p>Clarify that peer reviews should be completed prior to a system’s production.</p>
<p>Contingency Planning: Terminology is misaligned with Treasury Board security policy.</p>	<p>Harmonize the contingency requirement with the Policy on Government Security.</p>
<p>Timing of AIA release: AIA requirements do not specify a timing for AIA release.</p>	<p>Mandate the release of AIAs prior to the production of a system.</p>