To keep the [Directive on Automated Decision-Making](https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32592) current, relevant and useful to departments, Treasury Board of Canada Secretariat (TBS) reviews it every two years. We are seeking your input on the proposed recommendations as part of the 4th review of the directive.

Please review the following documents:

* [Overview – 4](https://wiki.gccollab.ca/File:Overview_4th_review_of_the_Directive_on_Automated_Decision-Making.pptx)[th](https://wiki.gccollab.ca/File:Overview_4th_review_of_the_Directive_on_Automated_Decision-Making.pptx) [review of the Directive on Automated Decision-Making](https://wiki.gccollab.ca/File:Overview_4th_review_of_the_Directive_on_Automated_Decision-Making.pptx)
* [Text changes to the Directive](https://wiki.gccollab.ca/File:Text_changes_to_the_AIA_tool.pdf)
* [Text changes to the AIA tool](https://wiki.gccollab.ca/File:Text_changes_to_the_AIA_tool.pdf)

Provide your feedback by **completing the survey by January 8**. We encourage you to please share the survey with your networks.

# Questions

## Support effective implementation

### Monitoring policy implementation

Goal: increase and verify departmental compliance with the directive to support improved outcomes for clients, federal institutions and Canadian society.

Recommendations:

* add a requirement for departments to submit a report to TBS confirming compliance with the directive and for TBS to publish a summary of those reports,
* add clarity to the role of the CIO of Canada,
* add a requirement to the ADM of the program to approve the completed AIA before publication.

You will need to review slide 8 of [Overview of the 4th Directive on Automated Decision-Making](https://wiki.gccollab.ca/File:Overview_4th_review_of_the_Directive_on_Automated_Decision-Making.pptx) ahead of responding to the questions.

1. Will the recommendations help achieve the goal of this topic? Please explain why or why not.

*For example, suggest other recommendations that would meet this goal, or explain how a recommendation does not go far enough toward reaching the goal.*

2. What changes should we make to the proposed Directive text to ensure the goal of this theme is met? Refer to the “Proposed updates” text in the right-hand column on slide 8 to help in your response.

*How, specifically, can we modify the text of the directive to increase compliance and improve outcomes? Leave this box blank if you don’t have specific text modification suggestions.*

### Excluded organizations

Goal: expand protections for clients and institutions by increasing the number of organizations subject to the directive.

Recommendation:

* remove the exclusion for Agents of Parliament from the Directive.

You will need to review slide 9 of [Overview of the 4th Directive on Automated Decision-Making](https://wiki.gccollab.ca/File:Overview_4th_review_of_the_Directive_on_Automated_Decision-Making.pptx) ahead of responding to the questions.

1. Will the recommendation help achieve the goal of this topic? Please explain why or why not.

*For example, suggest other recommendations that would meet this goal, or explain how the recommendation does not go far enough toward reaching the goal.*

2. What changes should we make to the proposed Directive text to ensure the goal of this theme is met? Refer to the “Proposed updates” text in the right-hand column on slide 9 to help in your response.

### Definition of AI

Goal: align the Government of Canada definition of “artificial intelligence” with a more recent and internationally recognized definition, increasing compatibility and facilitating understanding.

Recommendation:

* adopt the OECD definition.

You will need to review slide 10 of [Overview of the 4th Directive on Automated Decision-Making](https://wiki.gccollab.ca/File:Overview_4th_review_of_the_Directive_on_Automated_Decision-Making.pptx) ahead of responding to the questions.

1. Will the recommendation help achieve the goal of this topic? Please explain why or why not.

*For example, suggest other recommendations that would meet this goal, or explain how the recommendation does not go far enough toward reaching the goal.*

2. What changes should we make to the proposed Directive text to ensure the goal of this theme is met? Refer to the “Proposed updates” text in the right-hand column on slide 10 to help in your response.

## Strengthen client protections

### Human rights

Goal: clarify obligations and enhance impact assessment of human rights

Recommendations:

* require consideration of human rights during system testing and monitoring
* add questions to the AIA to strengthen the assessment of impacts to human rights.

You will need to review slide 11 of [Overview of the 4th Directive on Automated Decision-Making](https://wiki.gccollab.ca/File:Overview_4th_review_of_the_Directive_on_Automated_Decision-Making.pptx) ahead of responding to the questions, as well as pages 3 and 6 to 9 of the [Text Changes to the AIA tool document](https://wiki.gccollab.ca/File:Text_changes_to_the_AIA_tool.pdf).

1. Will the recommendations help achieve the goal of this topic? Please explain why or why not.

*For example, suggest other recommendations that would meet this goal, or explain how a recommendation does not go far enough toward reaching the goal.*

2. What changes should we make to the proposed Directive and AIA text to ensure the goal of this theme is met? Refer to the “Proposed updates” text in the right-hand column on slide 11, and to pages 3 and 6 to 9 of the Text Changes to the AIA tool to help in your response.

*How, specifically, can we modify the text of the directive and the AIA to strengthen human rights protections? Leave this box blank if you don’t have specific text modification suggestions.*

### Persons with disabilities

Goal: strengthen protections and assessment of impacts for persons with disabilities, raising awareness of the impacts of automated decision systems.

Recommendations:

* add requirement to document and correct system failures
* add new AIA questions to broaden consideration of impacts to persons with disabilities and to confirm compliance with accessibility standards.

You will need to review slide 12 of [Overview of the 4th Directive on Automated Decision-Making](https://wiki.gccollab.ca/File:Overview_4th_review_of_the_Directive_on_Automated_Decision-Making.pptx) ahead of responding to the questions, as well as pages 3, 4 and 6 to 8 of the [Text Changes to the AIA tool](https://wiki.gccollab.ca/File:Text_changes_to_the_AIA_tool.pdf) document.

1. Will the recommendations help achieve the goal of this topic? Please explain why or why not.

*For example, suggest other recommendations that would meet this goal, or explain how a recommendation does not go far enough toward reaching the goal.*

2. What changes should we make to the proposed Directive and AIA text to ensure the goal of this theme is met? Refer to the “Proposed updates” text in the right-hand column on slide 12, and to pages 3, 4 and 6 to 8 of the Text Changes to the AIA tool to help in your response.

*How, specifically, can we modify the text of the directive and the AIA to strengthen protections for persons with disabilities? Leave this box blank if you don’t have specific text modification suggestions.*

### Bans

Goal: identify which uses of automated decision systems pose an unacceptable risk and should not be used by the Government of Canada.

Recommendations:

* add a requirement to the Policy on Service and Digital about unacceptable uses
* add a requirement and an appendix to the Directive on Service and Digital and guidance on which uses of AI the Government of Canada considers unacceptable.

Please note that this is not a direct modification of the Directive on Automated Decision-Making, which means that the identified unacceptable uses of automation and AI could be in non-administrative decision-making situations.

You will need to review slides 13 and 14 of [Overview of the 4th Directive on Automated Decision-Making](https://wiki.gccollab.ca/File:Overview_4th_review_of_the_Directive_on_Automated_Decision-Making.pptx) ahead of responding to the questions.

1. Will the banned use cases indicated on slides 13 and 14 help achieve the goal of this topic? In your explanation, please indicate if the categories are too broad or too narrow.

2. Are there other use cases that should be prohibited? Please state them. Please also include immediate and future impacts to individuals, groups or communities if your suggested banned uses are not addressed.

3. Should the categories of unacceptable use be more focused on human rights, based on an unacceptable risk threshold, based on technology or capability, or something else? Please specify and explain your response.

## Enhance assessment of impacts

### AIA modifications

Goal: increase clarity and thoroughness of the AIA tool.

Recommendations:

* add questions to address gaps in existing sections of the AIA and support the other 4th review topics
* modify or add questions to respond to previous feedback.

You will need to review slide 15 of [Overview of the 4th Directive on Automated Decision-Making](https://wiki.gccollab.ca/File:Overview_4th_review_of_the_Directive_on_Automated_Decision-Making.pptx) ahead of responding to the questions as well as the [Text Changes to the AIA tool](https://wiki.gccollab.ca/File:Text_changes_to_the_AIA_tool.pdf) document.

1. Will the recommendations help achieve the goal of this topic? Please explain why or why not.

*For example, suggest other recommendations that would meet this goal, or explain how a recommendation does not go far enough toward reaching the goal.*

2. Will the proposed text changes in Section 6: About the algorithm help ensure the goal of this theme is met? What other changes do you suggest? Refer to the Text Changes to the AIA tool pages 5 and 6 to help in your response.

3. Will the proposed text changes in Section 8: Impact assessment help ensure the goal of this theme is met? What other changes do you suggest? Refer to the Text Changes to the AIA tool pages 6 to 8 to help in your response.

4. Will the proposed text changes in Section 12: De-risking and mitigation measures – procedural fairness help ensure the goal of this theme is met? What other changes do you suggest? Refer to the Text Changes to the AIA tool pages 12 to 13 to help in your response.

5. Will the proposed text changes to any other section other than those indicated in the questions above help ensure the goal of this theme is met? What other changes do you suggest? Refer to the Text Changes to the AIA tool to help in your response.

## Summary questions

1. Are there any proposed changes to the Directive or AIA that are concerning? Please specify the section and recommendation, identify the concern and propose ways to resolve it.

2. Is there a theme or topic that we overlooked or that is missing?

3. Please share additional comments you have on the 4th review.