

000 001 002 003 004 005 006 007 008 009 010 011 012 013 014 015 016 017 018 019 020 021 022 023 024 025 026 027 028 029 030 031 032 033 034 035 036 037 038 039 040 041 042 043 044 045 046 047 048 049 050 051 052 053 TEACHER ASCENT: ROBUST AND EFFICIENT MA- CHINE UNLEARNING VIA KNOWLEDGE DISTILLATION AND CONTINUAL LEARNING

Anonymous authors

Paper under double-blind review

ABSTRACT

Removing specific knowledge from a trained machine learning model is an open problem of increasing importance. Growing dataset sizes increase the likelihood of introducing biased, inaccurate, or private data. Moreover, increasing the number of parameters makes retraining models more costly. While powerful Machine Unlearning methods have emerged as effective alternatives to retraining, their practical application is often hindered by narrow functional ranges for hyperparameters, which typically require access to a retrained model for effective tuning. Established unlearning methods like SCRUB+R and SSD require precise specification of their hyperparameters to achieve unlearning whilst preventing catastrophic forgetting. We address this challenge by proposing Teacher Ascent (TA), a novel unlearning method that is based on knowledge distillation and continual learning. Inspired by Elastic Weight Consolidation (EWC), TA forgets target data while protecting parameters essential for generalization by using the Fisher Information Matrix. We conduct experiments on MNIST, CIFAR, and Pins Face Recognition across various unlearning scenarios: forgetting entire classes, subclasses, and mislabeled samples. Our results demonstrate that Teacher Ascent both mimics the functional behavior of a retrained model across unlearning tasks while being 6-19 times more efficient than retraining. More importantly, TA mitigates catastrophic forgetting and demonstrates robustness across a wide range of hyperparameters. By overcoming the critical stability and tuning challenges of previous approaches, Teacher Ascent represents a significant step towards making machine unlearning a viable and practical tool for real-world applications.

1 INTRODUCTION

As machine learning models grow in scale and become more integrated in society, their capacity to internalize and reproduce data presents significant legal and ethical challenges. Large models have been found to generate outputs containing proprietary or restricted content, and they often "memorize" specific training data points (Carlini et al., 2019; Zhou et al., 2024). This behavior has led to high-profile copyright infringement lawsuits such as those initiated by Getty Images (Brittain & Brittain, 2023) and The New York Times, which argue that generative AI models illegally store and regurgitate protected material (Cooper & Grimmelmann, 2024). The regulatory pressure has been intensified globally with privacy frameworks like the European Union's General Data Protection Regulation (European Parliament & Council of the European Union, 2016) with its "right to be forgotten", California's Consumer Privacy Act (CCPA) (Chau, 2018), and Brazil's Data Protection Law (LGPD) (Brazilian National Congress, 2018). Concurrently, broader frameworks like the EU's Artificial Intelligence Act aim to mitigate systemic risks by requiring model providers to prevent or minimize harmful or undesirable behavior (European Parliament & Council of the European Union, 2024). Together, these legal and safety requirements create a need for methods that can modify already trained and deployed models without the prohibitive cost of a complete retraining.

One emerging field that addresses this need is Machine Unlearning (MU) Bourtoule et al. (2021). Formally, we assume a model $\mathcal{M}_\theta : \mathbb{R}^{d^{(0)}} \rightarrow \mathbb{R}^C$ with parameters θ has been trained on a dataset $\mathcal{D} = \{(\mathbf{x}_i, y_i)\}_{i=1}^N$. Here, $d^{(0)}$ represents the input feature dimension and C is the number of classes. The objective is to remove the influence of a *forget set*, $\mathcal{D}_f \subset \mathcal{D}$, while preserving performance

054 on the remaining dataset, called the *retain set*, $\mathcal{D}_r = \mathcal{D} \setminus \mathcal{D}_f$. The ultimate goal is to produce an
 055 unlearned model that is functionally equivalent to a model trained from scratch on the retain set \mathcal{D}_r .
 056

057 The field of MU is broad, and many paradigms exist. While exact unlearning methods (Bourtoule
 058 et al., 2021; Yan et al., 2022) offer provable guarantees of data removal, they require accounting
 059 for unlearning during initial model training, limiting their use. This has motivated a shift towards
 060 approximate unlearning, which relaxes removal guarantees in favor of making unlearning applicable
 061 to a broader class of models. This paper focuses on a common practical scenario within approximate
 062 unlearning. We assume a “full-access” setting where both the retain and forget sets are available at
 063 unlearning time, as opposed to zero-shot (Chundawat et al., 2023) or zero-glance (Tarun et al., 2024;
 064 Zhou et al., 2025) approaches where data access is restricted at the time of unlearning (Nguyen
 065 et al., 2022). Our work targets sample-level unlearning, i.e., the removal of individual samples or
 066 batches of samples, which can be easily extended to entire classes. This scope allows us to develop
 067 a practical fine-tuning solution for modifying large, pre-existing models.

068 Several prior unlearning methods fall under this setting. Of particular interest is SCalable Re-
 069 membering and Unlearning unBound + Rewind (SCRUB+R) (Kurmanji et al., 2023), a fine-tuning
 070 method that seeks to preserve model performance while forgetting select data. Another noteworthy
 071 method is Selective Synaptic Dampening (SSD) (Foster et al., 2024), which seeks to identify and
 072 intervene on parameters specialized to the forget set. While both have shown promising perfor-
 073 mance, a key limitation is hyperparameter sensitivity. Specifically, SCRUB+R converges towards
 074 catastrophic forgetting if run for too long, a result of maximizing an *unbounded* KL-divergence
 075 term. Although this can seem like an implementation detail, the authors stress that the maximization
 076 step should be performed for “a few epochs in practice” and incorporate a rewind procedure, also to
 077 mitigate catastrophic forgetting. Meanwhile, SSD is highly dependent on the predefined threshold at
 078 which parameters are intervened on. Setting the threshold too low results in model degradation, and
 079 too high results in performing no model update at all. Crucially, choosing these hyperparameters
 080 appropriately is dependent on the forget set.

081 In this paper, we propose Teacher Ascent (TA), a fine-tuning based unlearning method built on
 082 principles from knowledge distillation and continual learning. TA consistently tracks the functional
 083 behavior of a retrained model across several benchmarks and forget sets while remaining far more
 084 efficient than retraining. Furthermore, TA exhibits high robustness to the choice of its hyperparam-
 085 eters making it applicable to practical unlearning scenarios.

086 We achieve this, in part, by maximizing *bounded* KL divergence terms during removal of \mathcal{D}_f ,
 087 thereby circumventing catastrophic forgetting. When forgetting, a regularization term, inspired by
 088 Elastic Weight Consolidation (EWC) (Kirkpatrick et al., 2017), protects parameters important for
 089 the retain set. To further protect knowledge about \mathcal{D}_r , an additional objective that encourages sim-
 090 ilar behavior to the original model on this dataset is optimized. Across the considered benchmarks,
 091 we find that catastrophic forgetting can be mitigated by sampling few minibatches from \mathcal{D}_r . This
 092 observation was key in making TA efficient compared to a retrained model.

092 1.1 CONTRIBUTIONS

093 We list the three main contributions:

- 094 • We propose Teacher Ascent (TA), an efficient unlearning method that consistently tracks
 095 the behavior of a retrained model and exhibits robustness to the choice of its hyperparame-
 096 ters.
- 097 • We demonstrate that the established fine-tuning method, SCRUB+R converges to catas-
 098 trophic forgetting, highlighting a critical reliability gap in existing approaches.
- 099 • We propose a more realistic evaluation protocol by searching for hyperparameters on a
 100 semantically related unlearning task. This is aimed at highlighting hyperparameter sensi-
 101 tivity, a key gap between current unlearning literature and practical forgetting requests.

102 1.2 RELATED WORK

103 **Fine-tuning and Knowledge Distillation:** A promising paradigm in approximate unlearning in-
 104 volves fine-tuning a model to erase the influence of specific data. One branch of this research relies

on training auxiliary models. These approaches include training an "incompetent teacher" to guide the unlearning process (Chundawat S et al., 2023), subtracting the output logits from a model trained to perform well on \mathcal{D}_f (Ji et al., 2024), or aligning knowledge gaps with models trained on external data (Wang et al., 2023). While often effective, this reliance on auxiliary models introduces significant overhead and complicates evaluation. Other methods modify the original model more directly. DELETE Zhou et al. (2025) decompose the loss into forget and retain terms, suppressing probability mass from forget set classes whilst preserving the relative probabilities among retained classes. Spartalis et al. (2025) propose LoTUS which smoothens the predicted probabilities up to an information theoretic bound to mimic the confidence of a retrained model on \mathcal{D}_f . (Tarun et al., 2024) use an impair and repair strategy, first degrading the model's performance on the forget set through techniques like targeted noise injection, and then recovering general performance by fine-tuning on the retain set. Similarly, Amnesiac Unlearning (Graves et al., 2021) reverses the learning process by subtracting stored parameter updates, but it is practicality limited by prohibitive storage costs and the necessity of its own repair phase. SCRUB+R (Kurmanji et al., 2023) follow a teacher-student framework and design an objective to make the model diverge on forget data while preserving knowledge about \mathcal{D}_r .

Fisher Information: Multiple existing methods use Fisher Information in an unlearning context. For a multivariate model that has converged to the optimal parameters, the Fisher Information Matrix (FIM) is defined as the covariance of the score function, i.e., the gradient of the log-likelihood. Diagonal FIM elements quantify how much information about the dataset is captured in each parameter, while the off-diagonal entries measure how strongly two parameters' effects on the likelihood are correlated. Hence, large off-diagonal values indicate that the parameters are not independently identifiable from the data. SSD (Foster et al., 2024) use the diagonal of the empirical FIM with respect to retain and forget data to quantify how much more information a parameter contains about \mathcal{D}_f versus \mathcal{D}_r . If this exceeds a pre-defined threshold, that parameter is intervened on. Golatkar et al. (2020) propose Fisher Forgetting which perturbs parameters with Gaussian noise with a variance inversely proportional to how important the parameter is for retain data.

Continual Learning: Continual learning is a field concerned with learning a new task without catastrophically forgetting previously learned knowledge. EWC (Kirkpatrick et al., 2017) is a canonical approach which computes the diagonal of the empirical Fisher Information Matrix with respect to a previously learned dataset. When learning the new task, the distance between current and previous task parameters is minimized, weighted by the corresponding Fisher Information. In the context of unlearning, Zhang et al. (2023) build on EWC and fine-tune with Fisher penalties to selectively degrade the forget set performance while preserving retain set knowledge. Wang et al. (2024) use EWC while performing gradient ascent for a generated image to protect generalization. The resulting model is used downstream to assess which training images are forgotten, allowing one to quantify which images from the data distribution influenced the synthesized image.

2 BACKGROUND

2.1 SCRUB+R

SCRUB+R builds on a teacher-student framework where the original model, \mathcal{M}_{θ_o} , acts as the teacher and the unlearned model, \mathcal{M}_{θ_u} , is the student. The method works by maximizing the distance between student and teacher probabilities on \mathcal{D}_f while staying close to the teacher on \mathcal{D}_r . To measure distances between probability distributions, temperature-scaled Kullback-Leibler divergence is used as presented in Hinton et al. (2014). Given unnormalized logits from the teacher model \mathbf{p} , and the student model \mathbf{q} (where $\mathbf{p}, \mathbf{q} \in \mathbb{R}^C$), the first step uses the tempered softmax, where $\tau \in \mathbb{R}^+$:

$$\mathbf{p}_\tau = \text{softmax} \left(\frac{\mathbf{p}}{\tau} \right), \quad \mathbf{q}_\tau = \text{softmax} \left(\frac{\mathbf{q}}{\tau} \right) \quad (1)$$

The knowledge distillation loss is then defined as the KL-divergence, D_{KL} , between these softened distributions, scaled by τ^2 :

$$\mathcal{L}_{KD}(\mathbf{p}, \mathbf{q}, \tau) = \tau^2 \cdot D_{KL}(\mathbf{p}_\tau \parallel \mathbf{q}_\tau) \quad (2)$$

162 To induce forgetting, part of the SCRUB+R objective maximizes the distilled KL-divergence be-
 163 tween teacher and student predictions on \mathcal{D}_f :

$$165 \quad \mathcal{L}_f(\mathcal{M}_{\theta_u}; \mathcal{M}_{\theta_o}, \mathcal{D}_f) = -\frac{1}{|\mathcal{D}_f|} \sum_{\mathbf{x} \in \mathcal{D}_f} \mathcal{L}_{KD}(\mathcal{M}_{\theta_o}(\mathbf{x}), \mathcal{M}_{\theta_u}(\mathbf{x}), \tau_f)$$

167 where τ_f is a hyperparameter. Optimizing \mathcal{L}_f in isolation leads to model degradation on \mathcal{D}_r . To
 168 this end, the authors propose a repair step where they minimize the cross-entropy along with \mathcal{L}_{KD}
 169 between student and teacher predictions on \mathcal{D}_r . Formally, the repair loss becomes:

$$171 \quad \mathcal{L}_{\text{repair}}(\mathcal{M}_{\theta_u}; \mathcal{M}_{\theta_o}, \mathcal{D}_r) = \frac{1}{|\mathcal{D}_r|} \sum_{(\mathbf{x}, y) \in \mathcal{D}_r} \mathcal{L}_{CE}(\mathcal{M}_{\theta_u}(\mathbf{x}), y) + \mathcal{L}_{KD}(\mathcal{M}_{\theta_o}(\mathbf{x}), \mathcal{M}_{\theta_u}(\mathbf{x}), \tau_r) \quad (3)$$

173 Where \mathcal{L}_{CE} denotes the cross-entropy loss:

$$175 \quad \mathcal{L}_{CE}(\mathbf{x}, y; \mathcal{M}_{\theta}) = -\log (\text{softmax}(\mathcal{M}_{\theta}(\mathbf{x})))_y$$

176 Due to the conflicting nature of \mathcal{L}_f and $\mathcal{L}_{\text{repair}}$, they are optimized in an alternating fashion similar
 177 to Goodfellow et al. (2020). Finally, to close any knowledge gaps between what a model trained on
 178 \mathcal{D}_r could generalize to on \mathcal{D}_f , a sequence of steps where only $\mathcal{L}_{\text{repair}}$ is minimized are carried out.

179 While this procedure can mimic the behavior of a retrained model on some unlearning tasks, the
 180 authors observe that it can still be prone to "over-forgetting" e.g., suspiciously poor performance on
 181 the forget set. To mitigate this, they proposed an additional rewind step to restore a previous model
 182 state. Specifically, they sample a rewind set $\mathcal{D}_{\text{rewind}}$ from the holdout validation set that is of the
 183 same label distribution as \mathcal{D}_f . They then calculate the error of the model obtained after performing
 184 alternating optimization on $\mathcal{D}_{\text{rewind}}$ and store this as a reference point. The final model is chosen as
 185 the one whose error on the forget set is as close to the reference point as possible.

187 2.1.1 SSD

188 The SSD method seeks to identify parameters highly specialized to \mathcal{D}_f and intervene on these.
 189 This is done post-hoc and hence no fine-tuning of the original model is performed. To quantify
 190 parameter importance with respect to a dataset, the diagonal of the empirical FIM (Schraudolph,
 191 2002; Martens, 2020) is used. Formally, given a vector of model parameters θ and dataset D , the
 192 diagonal of the empirical FIM is given as:

$$194 \quad F(\theta, D) = \frac{1}{|D|} \sum_{(\mathbf{x}, y) \in D} \nabla_{\theta} \log p(y|\mathbf{x}, \theta) \odot \nabla_{\theta} \log p(y|\mathbf{x}, \theta) \quad (4)$$

196 Where $p(y|\mathbf{x}, \theta)$ is the model's predicted probability of class y for input \mathbf{x} and \odot denotes the
 197 Hadamard product. To assess parameter importances, the authors compare entries in $\mathbf{f}^{(\mathcal{D}_f)} =$
 198 $F(\theta_o, \mathcal{D}_f)$ and $\mathbf{f}^{(\mathcal{D}_r)} = F(\theta_o, \mathcal{D}_r)$. Using these, a parameter, θ_j is intervened on according to
 199 the following rule:

$$201 \quad \theta_j = \begin{cases} \beta \cdot \theta_j & f_j^{(\mathcal{D}_f)} > \alpha f_j^{(\mathcal{D}_r)} \\ \theta_j & \text{otherwise} \end{cases}$$

205 where $\alpha \in \mathbb{R}^+$ is a hyperparameter determining the threshold for intervention. Here, the dampening
 206 factor $\beta \in [0, 1]$ is calculated as:

$$207 \quad \beta = \min \left(\frac{\lambda \cdot f_j^{(\mathcal{D}_r)}}{f_j^{(\mathcal{D}_f)}}, 1 \right)$$

210 Here $\lambda \in \mathbb{R}^+$ is a hyperparameter controlling how strongly parameters should be dampened.

212 3 METHODS

214 Teacher Ascent follows a teacher-student paradigm similar to SCRUB+R. The goal is to encourage
 215 similar behavior to the original model on retain data while removing knowledge about the forget

set that a retrained model cannot generalize to. Like Kurmanji et al. (2023), we use distilled KL-divergence (Equation 2) but with the key difference that we bound the probabilities that serve as input to the KL-divergence to $\epsilon > 0$ ¹ as:

$$\tilde{q}_i = \max(\epsilon, q_i) \quad (5)$$

This step is crucial to mitigating catastrophic forgetting. To see why, we first consider the case of unbounded maximization of Equation 2. Given that the activation function of \mathcal{M} has an unbounded codomain, the norm of θ_u will diverge.

Proposition 1 (Parameter norm diverges without bounding). *Maximizing $D_{KL}(\mathbf{p}_\tau \parallel \mathbf{q}_\tau)$ without bounding components of \mathbf{q}_τ admits no finite critical point for student logits. Consequently, gradient ascent causes the norm of the student parameters to diverge $\|\theta_u\| \rightarrow \infty$.*

The derivations and proof of Proposition 1 are provided in Appendix A. Next, consider the case where student probabilities are bounded using Equation 5. Let $\mathcal{A} = \{k | q_k > \epsilon\}$ denote the set of active indices where student probabilities are not bounded. Let $P_{\mathcal{A}} = \sum_{k \in \mathcal{A}} p_k$ be the total probability mass of the teacher for active indices. Then in the unlearning limit, where the student has shifted probability mass from all classes where $p_k > 0$, the gradient norm will be zero. This property is formalized in Corollary 1 below:

Corollary 1 (Gradient vanishing in the unlearning limit). *If the student suppresses all teacher-supported classes, i.e., $q_k \leq \epsilon$ for all k where $p_k > 0$, then $P_{\mathcal{A}} \rightarrow 0$ and*

$$\lim_{P_{\mathcal{A}} \rightarrow 0} \left\| \frac{\partial D_{KL}(\mathbf{p}_\tau \parallel \tilde{\mathbf{q}}_\tau)}{\partial \mathbf{q}} \right\| = 0.$$

An immediate consequence of this is that the norm of θ_u will remain finite. Further details can be found in Appendix A. The distilled KL-divergence with bounded probabilities is used to form the part of the objective in charge of confusing the unlearned model about the forget set. This term is formulated directly using the logit outputs from the teacher model, $\mathcal{M}_{\theta_o}(\mathbf{x})$, and the student model, $\mathcal{M}_{\theta_u}(\mathbf{x})$.

$$\mathcal{L}_{\text{unlearn}}(\mathcal{M}_{\theta_u}; \mathcal{M}_{\theta_o}, \mathcal{D}_f) = \frac{1}{|\mathcal{D}_f|} \sum_{\mathbf{x} \in \mathcal{D}_f} [\mathcal{L}_{KD}(\mathcal{M}_{\theta_u}(\mathbf{x}), \mathbf{1}, \tau_e) - \mathcal{L}_{KD}(\mathcal{M}_{\theta_o}(\mathbf{x}), \mathcal{M}_{\theta_u}(\mathbf{x}), \tau_f)] \quad (6)$$

The first term pushes the student’s predictions towards a uniform distribution by using a target logit vector of all ones, $\mathbf{1}$, (representing maximum uncertainty). This corresponds to maximizing the Shannon entropy of the student’s temperature-scaled probabilities on the forget set. The second term actively maximizes the divergence from the teacher’s original predictions. $\tau_e, \tau_f \in \mathbb{R}^+$ are temperature hyperparameters.

While minimizing $\mathcal{L}_{\text{unlearn}}$ during the forgetting phase can lead to effective unlearning, we found this to be unstable without further safeguarding (see appendix C). To improve stability, we introduce a regularization term inspired by Elastic Weight Consolidation (EWC) (Kirkpatrick et al., 2017). EWC protects essential knowledge by penalizing large changes to model parameters that are critical for performance on the retain set i.e., it reduces the plasticity of parameters identified as crucial for performance on the retain set. This is achieved by minimizing a weighted distance between the original parameters θ_o and the updated parameters θ_u . The weights are determined using the diagonal FIM (Kirkpatrick et al., 2017) given in Equation 4.

Early experiments showed that simply using the parameter importance derived from \mathcal{D}_r was not an adequate regularizer. Instead, we propose a more discriminative approach that computes importance as a **ratio** of the diagonal FIM between \mathcal{D}_r and \mathcal{D}_f . Informally, this ratio quantifies how much more information a parameter captures about retain data than forget data. Defining $\mathbf{f}^{(\mathcal{D}_r)} = F(\theta_o, \mathcal{D}_r)$ and $\mathbf{f}^{(\mathcal{D}_f)} = F(\theta_o, \mathcal{D}_f)$, the regularization term becomes:

$$\mathcal{L}_{\text{EWC}}(\mathcal{M}_{\theta_u}; \mathcal{M}_{\theta_o}, \mathbf{f}^{(\mathcal{D}_r)}, \mathbf{f}^{(\mathcal{D}_f)}) = \sum_j \frac{f_j^{(\mathcal{D}_r)}}{f_j^{(\mathcal{D}_f)}} (\theta_{u,j} - \theta_{o,j})^2 \quad (7)$$

Here, $f_j^{(\mathcal{D}_r)}$ and $f_j^{(\mathcal{D}_f)}$ are the j -th components of the FIM vectors $\mathbf{f}^{(\mathcal{D}_r)}$ and $\mathbf{f}^{(\mathcal{D}_f)}$, respectively

¹We set $\epsilon = 10^{-8}$ in all experiments.

Algorithm 1 Teacher Ascent Optimization procedure

```

270
271 1: Input: Original model  $\mathcal{M}_{\theta_o}$ , forget set  $\mathcal{D}_f$ , retain set  $\mathcal{D}_r$ , batch size  $b$ , total rounds  $R$ , total forget rounds  $R_f$ , EWC strength  $\lambda$ , repair
272    multiplier  $k$ , step size  $\eta$ .
273 2: Initialize: Unlearned model  $\mathcal{M}_{\theta_u} \leftarrow \mathcal{M}_{\theta_o}$ .
274 3:  $\mathbf{f}^{(\mathcal{D}_r)} \leftarrow F(\theta_o, \mathcal{D}_r)$ 
275 4:  $\mathbf{f}^{(\mathcal{D}_f)} \leftarrow F(\theta_o, \mathcal{D}_f)$ 
276 5: Define  $n_f \leftarrow \lceil |\mathcal{D}_f|/b \rceil$  ▷ Number of forget steps per round
277 6: for  $i$  from 1 to  $R$  do
278    if  $i \leq R_f$  then
279      for each minibatch  $\mathcal{B}_f$  in  $\mathcal{D}_f$  do
280         $\theta_u \leftarrow \theta_u - \eta \nabla_{\theta_u} \mathcal{L}_{\text{forget}}(\mathcal{M}_{\theta_u}; \mathcal{M}_{\theta_o}, \mathcal{D}_f, \mathcal{D}_r)$  ▷ Sample all minibatches from forget set
281      end for
282    end if
283    for  $j$  from 1 to  $n_f \cdot k$  do
284      Sample minibatch  $\mathcal{B}_r$  from  $\mathcal{D}_r$ 
285       $\theta_u \leftarrow \theta_u - \eta \nabla_{\theta_u} \mathcal{L}_{\text{repair}}(\mathcal{M}_{\theta_u}; \mathcal{M}_{\theta_o}, \mathcal{B}_r)$ 
286    end for
287  end for
288 17: return  $\theta_u$ 
289

```

287 while $\theta_{u,j}$ and $\theta_{o,j}$ are the j -th components of the model weights. The entire term being minimized
 288 during removal is:

$$290 \mathcal{L}_{\text{forget}}(\mathcal{M}_{\theta_u}; \mathcal{M}_{\theta_o}, \mathcal{D}_f, \mathcal{D}_r) = \mathcal{L}_{\text{unlearn}}(\mathcal{M}_{\theta_u}; \mathcal{D}_f) + \lambda \mathcal{L}_{\text{EWC}}(\mathcal{M}_{\theta_u}; \mathcal{M}_{\theta_o}, \mathbf{f}^{(\mathcal{D}_r)}, \mathbf{f}^{(\mathcal{D}_f)}) \quad (8)$$

291 where $\lambda \geq 0$ is a hyperparameter that balances the two objectives. While minimizing $\mathcal{L}_{\text{forget}}$ induces
 292 forgetting on \mathcal{D}_f , we observe, similar to Kurmanji et al. (2023), that performance on \mathcal{D}_r degrades.
 293 To mitigate this, we minimize the same loss $\mathcal{L}_{\text{repair}}$ on retain data as SCRUB+R (Equation 3).
 294

295 As in SCRUB+R, we find that optimizing both $\mathcal{L}_{\text{forget}}$ and $\mathcal{L}_{\text{repair}}$ jointly leads to instabilities due to
 296 the conflicting nature of the objectives. To remedy this, we minimize the objectives in an interleaved
 297 fashion as described in Section 2.1. This procedure is detailed in Algorithm 1. In all experiments
 298 we fix $k = 1$, which constitutes the most efficient choice. The observation that we only need
 299 to sample minibatches from \mathcal{D}_r to maintain performance was key for the efficiency gains seen in
 300 Table 3. However, for larger datasets we suspect that setting $k > 1$ may be necessary to retain
 301 generalizability.
 302

3.1 EVALUATION

304 We evaluate TA on the MNIST (Deng, 2012), CIFAR-10, CIFAR-100 (Krizhevsky, 2009), and
 305 Pins Face Recognition (Burak, 2019) datasets. The performance of the unlearned model (\mathcal{M}_{θ_u})
 306 is benchmarked against a **retrained model**, which is trained from scratch on only the retain set, \mathcal{D}_r .
 307 This retrained model represents the gold standard for unlearning.
 308

309 We assess performance across three key dimensions:

- 310 • **Model Utility:** We measure accuracy on the test set to ensure the model’s performance
 311 on retained knowledge is not degraded. The utility of the unlearned model should remain
 312 comparable to that of the retrained model.
- 314 • **Unlearning Efficacy:** To confirm information removal, we measure the unlearned model’s
 315 accuracy on the forget set \mathcal{D}_f . Effective unlearning is achieved when this accuracy drops
 316 to the level of the retrained model.
- 317 • **Privacy:** A model’s unusually high error rate on specific data points can signal to an at-
 318 tacker that they were part of a forget set. To quantify this vulnerability, we measure the
 319 model’s exposure to Membership Inference Attacks (MIA) (Shokri et al., 2017), following
 320 the implementation from Foster et al. (2024).

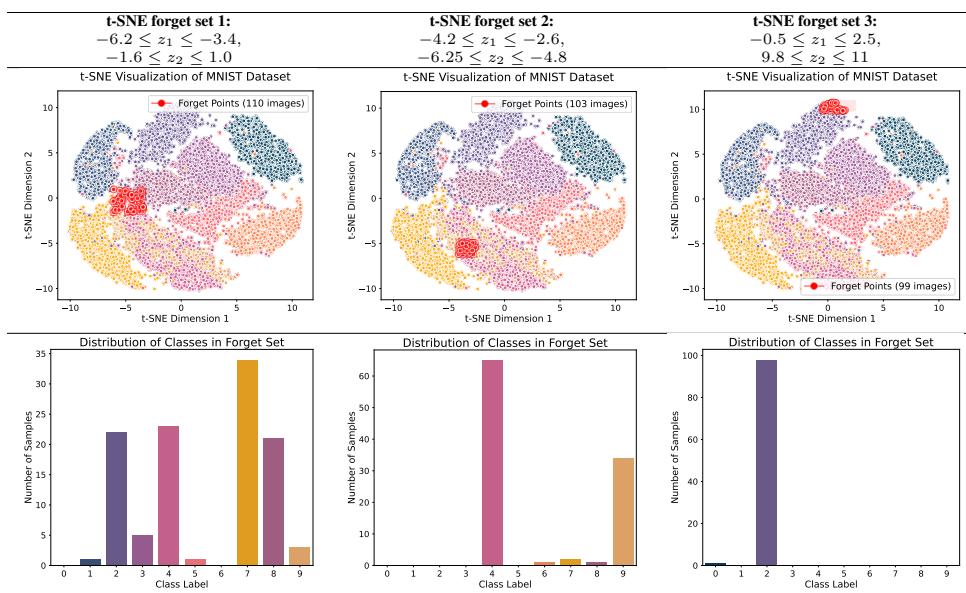
322 Crucially, the unlearned model should remain cross to retraining across these criteria. For instance,
 323 when forgetting an entire class, it is not sufficient to have perfect unlearning efficacy at the cost of
 324 catastrophically forgetting retain or validation data.

324 3.1.1 CONVERGENCE
325

326 Our MNIST experiments are designed to highlight the instabilities in SCRUB+R that motivated
327 Teacher Ascent. To accelerate experimentation, we subsample the training set to 10,000 images.
328 Experiment details surrounding the model architecture, training parameters, and data processing are
329 included in Appendix B.

330 Bertram et al. (2019) found that real-world removal requests come from a small subset of actors. To
331 simulate this experimentally, we construct forget sets from local neighborhoods of a t-SNE embed-
332 ding space (Maaten & Hinton, 2008). We define three forget sets from rectangular t-SNE regions
333 with varying class compositions, as detailed in Table 1.

334 Table 1: Different retain/forget splits based on the t-SNE qualitative selection, along with their forget
335 set class distributions.
336

357 3.1.2 BENCHMARKING
358

359 The goal of this experiment is to evaluate TA against other established MU methods on a variety of
360 unlearning tasks. To this end, experiments on CIFAR-10, CIFAR-100, and Pins Face Recognition
361 are carried out. Across these, a vision transformer (Dosovitskiy et al., 2021) with a classification
362 head is used, and all parameters are optimized during model trainings. Details on the specific archi-
363 tecture, training configuration, and data preprocessing are provided in Appendix B. For all datasets,
364 we consider forgetting an entire class. For CIFAR-10, we conduct additional experiments with for-
365 getting mislabeled data and subsets of a class. These scenarios and their motivation are outlined
366 below:

367 **Forgetting a Class:** A common baseline for assessing unlearning effectiveness. This mimics a sce-
368 nario where one has to remove sensitive knowledge from a model, such as dangerous information,
369 explicit content, or copyrighted material.

370 **Forgetting a random subset of a class:** In this setting, there is naturally some information overlap
371 between the retain and forget data. This resembles a situation where a deletion request has been
372 made for observations that a retrained model can, to some extent, generalize to.

373 **Forgetting Corrupted Data:** Removing a small set of mislabeled samples to test the model’s ability
374 to correct data contamination, a common issue in real-world datasets. It has been shown that some
375 of the most common datasets have at least 3.3% mislabeled samples (Northcutt et al., 2021).

376 A common paradigm in unlearning evaluation is to search for hyperparameters such that the un-
377 learned model is as close to a retrained model as possible. This, however, does not resemble a
378 practical unlearning setting where one cannot determine these optimally. To provide a more realistic
379 and fair benchmark, we introduce, to our knowledge, a new evaluation protocol: for each scenario,

378 we select hyperparameters by optimizing performance on a separate but semantically related proxy
 379 unlearning task. The best hyperparameters from the proxy task are then used, without modification,
 380 for the final downstream evaluation. This setup is detailed in Table 2. We conduct the hyperpa-
 381 rameter search using Optuna’s Tree-structured Parzen Estimator (TPE) (Bergstra et al., 2011; Akiba
 382 et al., 2019). For each proxy task, we run 30 trials and apply the best-performing hyperparameter
 383 configuration to its corresponding downstream task.

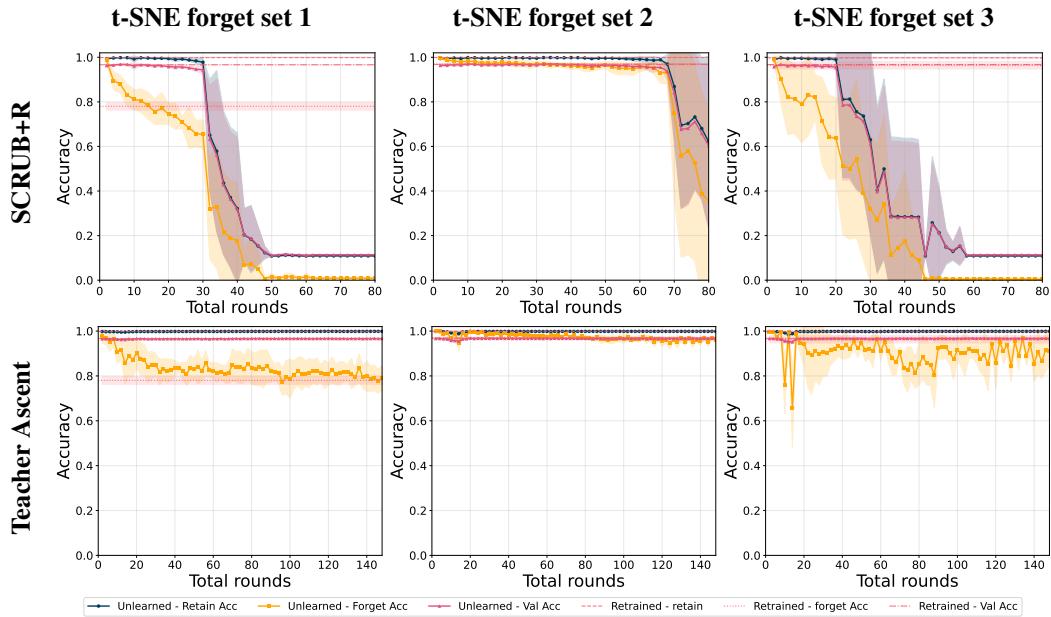
384
 385 Table 2: Forget set construction strategy on the various benchmarks for the downstream task as well
 386 as hyperparameter search.

Dataset	Forget set type	Downstream forget set	Hyperparameter search forget set
CIFAR-10	Whole class	Forget all images in the ship class.	Forget all images in the airplane class.
CIFAR-10	Subclass	Forget 500 samples (10%) from the horse class.	Forget 500 samples (10%) from the deer class.
CIFAR-10	Corrupted	Forget 200 samples from the automobile class that were mislabeled as belonging to the truck class.	Forget 200 samples from the airplane class that were mislabeled as belonging to the boat class.
CIFAR-100	Whole class	Forget all images in the rocket class	Forget all images in the bridge class.
Pins FR	Whole class	Forget all images (173) of Tom Cruise	Forget all images (110) of Zac Efron

394 Note that we generally pick the hyperparameter search forget set to belong to the same super-class as
 395 the downstream forget set e.g., when forgetting an entire class in CIFAR-10, both forget sets contain
 396 vehicles. We deviate from this only on the CIFAR-100 task to gauge the effect of increasing the
 397 dissimilarity between the downstream and hyperparameter search forget sets.

4 RESULTS AND DISCUSSION

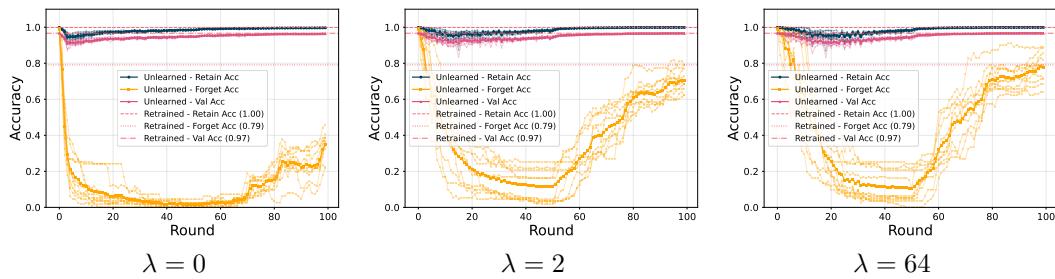
401 First, we investigate the convergence of SCRUB+R and TA on the MNIST forget sets seen in Table 1.
 402 To assess how the number of total rounds and forget rounds affect the performance of the two
 403 methods, we compute the model accuracies as a function of total rounds in Figure 1. We set the
 404 number of forgetting rounds to $R_f = \frac{R}{2}$ for both SCRUB+R and TA.



427 Figure 1: Accuracies of the unlearned model after applying SCRUB+R and TA as a function of the
 428 total number of rounds. Mean and std. of the accuracies are provided and were computed over 5
 429 seeds with different model initializations. Results are reported for the three MNIST forget sets in
 430 Table 1. This illustrates that while SCRUB+R drops the forget set accuracy, the model eventually
 431 suffers from catastrophic forgetting. This instability, and its dependence on the specific forget set
 \mathcal{D}_f , complicates hyperparameter selection, particularly the number of unlearning rounds.

432 As evident from Figure 1, the unlearned models produced by SCRUB+R are highly dependent on
 433 the number of forget rounds. We fix the hyperparameters in this experiment (see Appendix B),
 434 however, the onset of catastrophic forgetting in SCRUB+R was observed consistently irrespective
 435 of these. In Figure 1, only a narrow range of the unlearned models on t-SNE forget set 1, those
 436 around 10-20 total rounds, approach the forget accuracy of a retrained model. Meanwhile on t-SNE
 437 forget set 3, choosing exactly 2 and 4 total rounds are the **only** configurations that approaches a
 438 retrained model. Looking at the resulting unlearned models for the three forget sets in combination,
 439 it is clear that there is no trivial way of pre-determining the appropriate number of forget and repair
 440 epochs. Meanwhile, the unlearned models produced by TA, as seen in Figure 1, match a retrained
 441 model on the forget set far more consistently. Furthermore, the retain and validation accuracies are
 442 unaffected by the number of rounds, addressing a key limitation of SCRUB+R.
 443

444 To give insight into the dynamics of TA during unlearning as well as assess whether protecting
 445 parameters important for the retain set affects the unlearned model, we plot accuracies as a function
 446 of rounds for varying λ in Figure 2. As seen, there is little deviation between the final unlearned
 447 model at round 100 for $\lambda \in \{2, 64\}$. However, omitting regularization entirely significantly degrades
 448 the unlearned model’s performance on \mathcal{D}_f . We report further results on this in Appendix C. Herein,
 449 it also appears that the variability of the final unlearned models’ forget accuracy increases when
 450 omitting EWC regularization.



451
 452 Figure 2: Effect of different regularization strengths on the convergence of Teacher Ascent. Experi-
 453 ments were run on t-SNE forget set 1 for 100 total rounds.
 454

455 Next, we benchmark TA against SCRUB+R, SSD, and LoTUS, seen in Table 3, on the tasks un-
 456 learning tasks listed in Table 2. For reference, we also report the performance of the original model.
 457 Note that LoTUS is omitted from the corrupted task since the method is ill defined for that type
 458 of unlearning setting. Considering the CIFAR-10 unlearning tasks, TA emerges as the most viable
 459 method when factoring in computation time. Its accuracy across data splits consistently tracks that
 460 of a retrained model while remaining 6 to 19 times faster than retraining. SCRUB+R also closely
 461 matches the retrained model, with the exception of forgetting mislabeled data. The main drawback
 462 with SCRUB+R lies with its efficiency, nearly matching that of a retrained model on most forget
 463 sets. The SSD method, while being efficient, is highly unreliable. When forgetting an entire class
 464 and a subset of a class, it remains too conservative and on mislabeled data the model performance
 465 degrades to random guessing. This highlights that the SSD hyperparameters are highly sensitive to
 466 the forget set and original model’s learned representation. Meanwhile, LoTUS degrades retain and
 467 validation performances slightly on CIFAR-100 and Pins FR, and remains too conservative on sub-
 468 class forgetting in CIFAR-10. The large differences in runtime for LoTUS can be attributed to the
 469 subset size hyperparameter being tuned which specifies how big a fraction of retain data should be
 470 used during unlearning. Also, the large standard deviation in runtime for LoTUS on the CIFAR-10
 471 sub-class task is due to the method’s early stopping mechanism.
 472

473 In terms of privacy preservation, measured by the MIA probability, no unlearning method matches
 474 retraining exactly across forget sets. However, both TA and SCRUB+R yield a notable shift from
 475 the original model’s privacy profile, suggesting that the unlearned model’s relative uncertainty on
 476 the forget set increases and comes closer to resembling retraining. In the corrupted setting, the
 477 decreased MIA probabilities indicate that remnants of the mislabeled data still persist, resulting in
 478 higher uncertainties. It should be mentioned, however, that MIA measures have met some critique
 479 (Rezaei & Liu, 2021; Zhang et al., 2025). While TA and SCRUB+R show promise and lessen the gap
 480 in MIA probability to a retrained model, the remaining difference indicates that perfectly replicating
 481 the privacy profile of a retrained model is a challenging task and warrants further investigation.
 482

486
 487 Table 3: Accuracies on the benchmarks and unlearning tasks described in 3.1.2. The mean and
 488 standard deviation across 10 runs with different model initializations is reported. The forget set was
 489 kept constant across the different runs. Note that accuracies in the corrupted setting are reported for
 490 the true class. The method closest to retraining is highlighted in bold. Methods highlighted in gray
 491 failed in the unlearning setting, defined as having an absolute deviation of more than 20 percentage
 492 points from retraining on any accuracy metric. For runtime, the fastest method is highlighted in bold
 493 granted that it did not fail the unlearning task.

Dataset	Forget set type	Method	MIA	Retain acc	Forget acc	Val acc	Time (sec)
CIFAR-10	Whole class	Original	0.97 ± 0.01	1.00 ± 0.00	1.00 ± 0.00	0.98 ± 0.00	-
		Retraining	0.22 ± 0.02	1.00 ± 0.00	0.00 ± 0.00	0.88 ± 0.00	2466.99 ± 25.27
		SCRUB+R	0.31 ± 0.28	1.00 ± 0.00	0.00 ± 0.00	0.87 ± 0.00	2242.65 ± 88.74
		SSD	0.82 ± 0.31	1.00 ± 0.01	0.91 ± 0.27	0.97 ± 0.04	71.87 ± 0.21
		LoTUS	0.00 ± 0.00	0.98 ± 0.00	0.05 ± 0.03	0.85 ± 0.00	16.93 ± 0.67
		TA	0.00 ± 0.00	1.00 ± 0.00	0.00 ± 0.00	0.88 ± 0.00	378.30 ± 7.54
CIFAR-10	Corrupted	Original	0.17 ± 0.04	1.00 ± 0.00	0.16 ± 0.05	0.98 ± 0.00	-
		Retraining	0.88 ± 0.01	1.00 ± 0.00	0.98 ± 0.01	0.98 ± 0.00	2932.59 ± 75.44
		SCRUB+R	0.46 ± 0.21	0.96 ± 0.03	0.90 ± 0.07	0.93 ± 0.03	1602.98 ± 87.19
		SSD	0.00 ± 0.00	0.10 ± 0.02	0.00 ± 0.00	0.10 ± 0.02	67.38 ± 0.91
		TA	0.52 ± 0.16	0.99 ± 0.00	1.00 ± 0.01	0.97 ± 0.00	153.03 ± 3.10
		Original	0.98 ± 0.01	1.00 ± 0.00	1.00 ± 0.00	0.98 ± 0.00	-
CIFAR-10	Subclass	Retraining	0.90 ± 0.01	1.00 ± 0.00	0.98 ± 0.00	0.98 ± 0.00	3012.37 ± 112.59
		SCRUB+R	0.93 ± 0.01	1.00 ± 0.00	0.98 ± 0.01	0.98 ± 0.00	2818.12 ± 78.66
		SSD	0.94 ± 0.06	1.00 ± 0.00	1.00 ± 0.00	0.98 ± 0.00	65.89 ± 1.22
		LoTUS	0.92 ± 0.05	1.00 ± 0.00	1.00 ± 0.01	0.98 ± 0.00	649.36 ± 237.81
		TA	0.89 ± 0.09	0.99 ± 0.01	0.98 ± 0.02	0.97 ± 0.01	172.16 ± 0.08
		Original	0.93 ± 0.01	1.00 ± 0.00	1.00 ± 0.00	0.87 ± 0.00	-
CIFAR-100	Whole class	Retraining	0.13 ± 0.03	1.00 ± 0.00	0.00 ± 0.00	0.86 ± 0.00	2710.57 ± 135.72
		SCRUB+R	0.03 ± 0.03	1.00 ± 0.00	0.00 ± 0.00	0.87 ± 0.00	2136.08 ± 27.81
		SSD	0.01 ± 0.00	0.99 ± 0.00	0.00 ± 0.00	0.85 ± 0.00	66.76 ± 1.33
		LoTUS	0.00 ± 0.00	0.96 ± 0.00	0.05 ± 0.04	0.78 ± 0.00	1035.39 ± 0.42
		TA	0.02 ± 0.03	1.00 ± 0.00	0.00 ± 0.01	0.86 ± 0.00	140.04 ± 1.33
		Original	0.81 ± 0.04	1.00 ± 0.00	1.00 ± 0.00	0.89 ± 0.01	-
Pins FR	Whole class	Retrained	0.05 ± 0.02	1.00 ± 0.00	0.00 ± 0.00	0.88 ± 0.01	2654.86 ± 23.26
		SCRUB+R	0.03 ± 0.02	0.99 ± 0.01	0.00 ± 0.00	0.83 ± 0.01	721.08 ± 19.02
		SSD	0.01 ± 0.01	1.00 ± 0.00	0.00 ± 0.00	0.88 ± 0.01	21.23 ± 0.15
		LoTUS	0.00 ± 0.00	1.00 ± 0.00	0.18 ± 0.19	0.89 ± 0.01	222.09 ± 0.12
		TA	0.01 ± 0.01	1.00 ± 0.00	0.00 ± 0.00	0.88 ± 0.01	147.19 ± 0.57

515
 516 On CIFAR-100 and Pins Face Recognition, reported in Table 3, TA perfectly matches the retrained
 517 model across accuracies. Surprisingly, SSD performs consistently well on these benchmarks. This
 518 is impressive considering that the CIFAR-100 hyperparameter sweep forget set was from a different
 519 super-class than the downstream forget set. Perhaps, this can be attributed to having many classes
 520 and fewer samples per class resulting in the diagonal FIM being a better approximation of the full
 521 FIM. However, further investigation is required to verify this. It could be interesting to further
 522 investigate how well the various unlearn methods perform as the difference between the downstream
 523 forget set and the one used for hyperparameter search increases. We defer this to future research.
 524

5 CONCLUSION

525 We propose Teacher Ascent, a novel unlearning method inspired by knowledge distillation and
 526 continual learning principles. Across different benchmarks and unlearning tasks, TA consistently tracks
 527 the behavior of a retrained model, shows less sensitivity to its hyperparameters, and remains highly
 528 efficient compared to retraining. By benchmarking the unlearning methods on suboptimal hyper-
 529 parameters, the reported results are more faithful to real-life unlearning scenarios. The consistent
 530 results of TA in this setting represent a big step towards making unlearning viable in practical sce-
 531 narios where one cannot search for ideal hyperparameters.
 532

533
 534
 535
 536
 537
 538
 539

540 USE OF LLM STATEMENT

541

542 LLMs have been used for proofreading, writing code, and gaining an overview of the field of Ma-
543 chine Unlearning in the early stages of finding relevant work.

544

545 ETHICS STATEMENT

546

547 The authors declare no conflicts of interest.

548

549 REPRODUCIBILITY STATEMENT

550

551 All code for reproducing the experiments is available publicly at:

552 <https://anonymous.4open.science/r/TeacherAscent-D065/>

553

554

555

556

557

558

559

560

561

562

563

564

565

566

567

568

569

570

571

572

573

574

575

576

577

578

579

580

581

582

583

584

585

586

587

588

589

590

591

592

593

594 REFERENCES
595

596 Takuya Akiba, Shotaro Sano, Toshihiko Yanase, Takeru Ohta, and Masanori Koyama. Optuna: A
597 Next-generation Hyperparameter Optimization Framework. In Ankur Teredesai, Vipin Kumar,
598 Ying Li, Rómer Rosales, Evimaria Terzi, and George Karypis (eds.), *Proceedings of the 25th
599 ACM SIGKDD International Conference on Knowledge Discovery & Data Mining, KDD 2019,
600 Anchorage, AK, USA, August 4-8, 2019*, pp. 2623–2631. ACM, 2019. doi: 10.1145/3292500.
601 3330701. URL <https://doi.org/10.1145/3292500.3330701>.

602 James Bergstra, Rémi Bardenet, Yoshua Bengio, and Balázs Kégl. Algorithms for Hyper-
603 Parameter Optimization. In John Shawe-Taylor, Richard S. Zemel, Peter L. Bartlett, Fer-
604 nando C. N. Pereira, and Kilian Q. Weinberger (eds.), *Advances in Neural Information
605 Processing Systems 24: 25th Annual Conference on Neural Information Processing Sys-
606 tems 2011. Proceedings of a meeting held 12-14 December 2011, Granada, Spain*, pp.
607 2546–2554, 2011. URL <https://proceedings.neurips.cc/paper/2011/hash/86e8f7ab32cf12577bc2619bc635690-Abstract.html>.

609 Theo Bertram, Elie Bursztein, Stephanie Caro, Hubert Chao, Rutledge Chin Feman, Peter Fleischer,
610 Albin Gustafsson, Jess Hemerly, Chris Hibbert, Luca Invernizzi, Lanah Kammourieh Donnelly,
611 Jason Ketover, Jay Laefer, Paul Nicholas, Yuan Niu, Harjinder Obhi, David Price, Andrew Strait,
612 Kurt Thomas, and Al Verney. Five Years of the Right to be Forgotten. In *Proceedings of the 2019
613 ACM SIGSAC Conference on Computer and Communications Security*, pp. 959–972, London
614 United Kingdom, November 2019. ACM. ISBN 978-1-4503-6747-9. doi: 10.1145/3319535.
615 3354208. URL <https://dl.acm.org/doi/10.1145/3319535.3354208>.

616 Lucas Bourtoule, Varun Chandrasekaran, Christopher A. Choquette-Choo, Hengrui Jia, Adelin
617 Travers, Baiwu Zhang, David Lie, and Nicolas Papernot. Machine Unlearning. In *42nd IEEE
618 Symposium on Security and Privacy, SP 2021, San Francisco, CA, USA, 24-27 May 2021*, pp.
619 141–159. IEEE, 2021. doi: 10.1109/SP40001.2021.00019. URL <https://doi.org/10.1109/SP40001.2021.00019>.

621 Brazilian National Congress. Lei Geral de Proteção de Dados Pessoais (LGPD), Right to
622 Delete (Article 18), August 2018. URL https://www.planalto.gov.br/ccivil_03/_ato2015-2018/2018/lei/L13709.htm. The LGPD’s Right to Delete allows individu-
623 als to request the deletion of personal data under certain conditions.

626 Blake Brittain and Blake Brittain. Getty Images lawsuit says Stability AI misused pho-
627 tos to train AI. *Reuters*, February 2023. URL <https://www.reuters.com/legal/getty-images-lawsuit-says-stability-ai-misused-photos-train-ai-2023-02-06/>.

629 Burak. Pins Face Recognition, 2019. URL <https://www.kaggle.com/datasets/burak/pins-face-recognition>.

632 Nicholas Carlini, Chang Liu, Úlfar Erlingsson, Jernej Kos, and Dawn Song. The Secret Sharer:
633 Evaluating and Testing Unintended Memorization in Neural Networks. In Nadia Heninger and
634 Patrick Traynor (eds.), *28th USENIX Security Symposium, USENIX Security 2019, Santa Clara,
635 CA, USA, August 14-16, 2019*, pp. 267–284. USENIX Association, 2019. URL <https://www.usenix.org/conference/usenixsecurity19/presentation/carlini>.

637 Ed Chau. California Consumer Privacy Act (CCPA), June 2018. URL https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB375.

640 Vikram S. Chundawat, Ayush K. Tarun, Murari Mandal, and Mohan S. Kankanhalli. Zero-Shot
641 Machine Unlearning. *IEEE Trans. Inf. Forensics Secur.*, 18:2345–2354, 2023. doi: 10.1109/
642 TIFS.2023.3265506. URL <https://doi.org/10.1109/TIFS.2023.3265506>.

644 Vikram Chundawat S, Ayush Tarun K, Murari Mandal, and Mohan Kankanhalli. Can Bad Teach-
645 ing Induce Forgetting? Unlearning in Deep Networks Using an Incompetent Teacher. *Pro-
646 ceedings of the AAAI Conference on Artificial Intelligence*, 37(6), June 2023. doi: <https://doi.org/10.1609/aaai.v37i6.25879>. URL <https://ojs.aaai.org/index.php/AAAI/article/view/25879>.

648 A. Feder Cooper and James Grimmelmann. The Files are in the Computer: Copyright, Memorization,
 649 and Generative AI. *CoRR*, abs/2404.12590, 2024. doi: 10.48550/ARXIV.2404.12590. URL
 650 <https://doi.org/10.48550/arXiv.2404.12590>. arXiv: 2404.12590.

651

652 Ekin D. Cubuk, Barret Zoph, Dandelion Mane, Vijay Vasudevan, and Quoc V. Le. AutoAugment:
 653 Learning Augmentation Strategies From Data. In *2019 IEEE/CVF Conference on Computer
 654 Vision and Pattern Recognition (CVPR)*, pp. 113–123, Long Beach, CA, USA, June 2019. IEEE.
 655 ISBN 978-1-7281-3293-8. doi: 10.1109/CVPR.2019.00020. URL <https://ieeexplore.ieee.org/document/8953317/>.

656

657 Jia Deng, Wei Dong, Richard Socher, Li-Jia Li, Kai Li, and Li Fei-Fei. ImageNet: A large-scale hier-
 658 archical image database. In *2009 IEEE Conference on Computer Vision and Pattern Recognition*,
 659 pp. 248–255, 2009. doi: 10.1109/CVPR.2009.5206848.

660

661 Li Deng. The MNIST Database of Handwritten Digit Images for Machine Learning Research [Best
 662 of the Web]. *IEEE Signal Processing Magazine*, 29(6):141–142, 2012. doi: 10.1109/MSP.2012.
 663 2211477.

664

665 Alexey Dosovitskiy, Lucas Beyer, Alexander Kolesnikov, Dirk Weissenborn, Xiaohua Zhai, Thomas
 666 Unterthiner, Mostafa Dehghani, Matthias Minderer, Georg Heigold, Sylvain Gelly, Jakob Uszko-
 667 reit, and Neil Houlsby. An Image is Worth 16x16 Words: Transformers for Image Recognition at
 668 Scale. In *9th International Conference on Learning Representations, ICLR 2021, Virtual Event,
 669 Austria, May 3-7, 2021*. OpenReview.net, 2021. URL <https://openreview.net/forum?id=YicbFdNTTy>.

670

671 European Parliament and Council of the European Union. General Data Protection Regulation
 672 (GDPR) – Article 17: Right to Erasure, April 2016. URL <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679>. The Right to Erasure allows
 673 individuals to request deletion of personal data under certain conditions.

674

675 European Parliament and Council of the European Union. Regulation (EU) 2024/1689 of
 676 the European Parliament and the Council of 13 June 2024 (Artificial Intelligence Act), Au-
 677 gust 2024. URL <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R1689>.

678

679 Jack Foster, Stefan Schoepf, and Alexandra Brintrup. Fast Machine Unlearning without Retrain-
 680 ing through Selective Synaptic Dampening. *Proceedings of the AAAI Conference on Artifi-
 681 cial Intelligence*, 38(1):12043–12051, March 2024. doi: 10.1609/aaai.v38i11.29092. URL
 682 <https://ojs.aaai.org/index.php/AAAI/article/view/29092>.

683

684 Aditya Golatkar, Alessandro Achille, and Stefano Soatto. Eternal Sunshine of the Spotless Net:
 685 Selective Forgetting in Deep Networks. In *2020 IEEE/CVF Conference on Computer Vision
 686 and Pattern Recognition, CVPR 2020, Seattle, WA, USA, June 13-19, 2020*, pp. 9301–9309.
 687 Computer Vision Foundation / IEEE, 2020. doi: 10.1109/CVPR42600.2020.00932. URL
 688 https://openaccess.thecvf.com/content_CVPR_2020/html/Golatkar_Eternal_Sunshine_of_the_Spotless_Net_Selective_Forgettiing_in_Deep_CVPR_2020_paper.html.

689

690 Ian J. Goodfellow, Jean Pouget-Abadie, Mehdi Mirza, Bing Xu, David Warde-Farley, Sherjil
 691 Ozair, Aaron C. Courville, and Yoshua Bengio. Generative adversarial networks. *Commun.
 692 ACM*, 63(11):139–144, 2020. doi: 10.1145/3422622. URL <https://doi.org/10.1145/3422622>.

693

694 Laura Graves, Vineel Nagisetty, and Vijay Ganesh. Amnesiac Machine Learning. In *Thirty-
 695 Fifth AAAI Conference on Artificial Intelligence, AAAI 2021, Thirty-Third Conference on In-
 696 novative Applications of Artificial Intelligence, IAAI 2021, The Eleventh Symposium on Ed-
 697 ucational Advances in Artificial Intelligence, EAAI 2021, Virtual Event, February 2-9, 2021*,
 698 pp. 11516–11524. AAAI Press, 2021. doi: 10.1609/AAAI.V35I13.17371. URL <https://doi.org/10.1609/aaai.v35i13.17371>.

699

700 Geoffrey Hinton, Oriol Vinyals, and Jeffrey Dean. Distilling the Knowledge in a Neural Network.
 701 In *NeurIPS Deep Learning Workshop*, 2014.

702 Jiabao Ji, Yujian Liu, Yang Zhang, Gaowen Liu, Ramana Kompella, Sijia Liu, and Shiyu
 703 Chang. Reversing the Forget-Retain Objectives: An Efficient LLM Unlearning Frame-
 704 work from Logit Difference. In Amir Globersons, Lester Mackey, Danielle Belgrave,
 705 Angela Fan, Ulrich Paquet, Jakub M. Tomczak, and Cheng Zhang (eds.), *Advances in
 706 Neural Information Processing Systems 38: Annual Conference on Neural Information
 707 Processing Systems 2024, NeurIPS 2024, Vancouver, BC, Canada, December 10 - 15,
 708 2024*. URL http://papers.nips.cc/paper_files/paper/2024/hash/171291d8fed723c6dfc76330aa827ff8-Abstract-Conference.html.

710 James Kirkpatrick, Razvan Pascanu, Neil Rabinowitz, Joel Veness, Guillaume Desjardins, Andrei A.
 711 Rusu, Kieran Milan, John Quan, Tiago Ramalho, Agnieszka Grabska-Barwinska, Demis Hass-
 712 abis, Claudia Clopath, Dharshan Kumaran, and Raia Hadsell. Overcoming catastrophic forget-
 713 ting in neural networks. *Proceedings of the National Academy of Sciences*, 114(13):3521–3526,
 714 March 2017. doi: 10.1073/pnas.1611835114. URL <https://www.pnas.org/doi/10.1073/pnas.1611835114>. Publisher: Proceedings of the National Academy of Sciences.

716 Alex Krizhevsky. Learning multiple layers of features from tiny images. Master’s thesis, University
 717 of Toronto, 2009.

719 Meghdad Kurmanji, Peter Triantafillou, Jamie Hayes, and Eleni Triantafillou. To-
 720 wards Unbounded Machine Unlearning. In Alice Oh, Tristan Naumann, Amir Glober-
 721 son, Kate Saenko, Moritz Hardt, and Sergey Levine (eds.), *Advances in Neural In-
 722 formation Processing Systems 36: Annual Conference on Neural Information Pro-
 723 cessing Systems 2023, NeurIPS 2023, New Orleans, LA, USA, December 10 - 16,
 724 2023*. URL http://papers.nips.cc/paper_files/paper/2023/hash/062d711fb777322e2152435459e6e9d9-Abstract-Conference.html.

726 Laurens van der Maaten and Geoffrey Hinton. Visualizing Data using t-SNE. *Journal of Machine
 727 Learning Research*, 9(86):2579–2605, 2008. ISSN 1533-7928. URL <http://jmlr.org/papers/v9/vandermaaten08a.html>.

730 James Martens. New Insights and Perspectives on the Natural Gradient Method. *J. Mach. Learn.
 731 Res.*, 21:146:1–146:76, 2020. URL <https://jmlr.org/papers/v21/17-678.html>.

732 Thanh Tam Nguyen, Thanh Trung Huynh, Phi Le Nguyen, Alan Wee-Chung Liew, Hongzhi Yin,
 733 and Quoc Viet Hung Nguyen. A Survey of Machine Unlearning. *CoRR*, abs/2209.02299, 2022.
 734 doi: 10.48550/ARXIV.2209.02299. URL <https://doi.org/10.48550/arXiv.2209.02299>. arXiv: 2209.02299.

737 Curtis G. Northcutt, Anish Athalye, and Jonas Mueller. Pervasive Label Errors in Test Sets
 738 Destabilize Machine Learning Benchmarks. In Joaquin Vanschoren and Sai-Kit Yeung (eds.),
 739 *Proceedings of the Neural Information Processing Systems Track on Datasets and Bench-
 740 marks 1, NeurIPS Datasets and Benchmarks 2021, December 2021, virtual*, 2021. URL
 741 <https://datasets-benchmarks-proceedings.neurips.cc/paper/2021/hash/f2217062e9a397a1dca429e7d70bc6ca-Abstract-round1.html>.

743 Shahbaz Rezaei and Xin Liu. On the Difficulty of Membership Inference Attacks. In *IEEE Confer-
 744 ence on Computer Vision and Pattern Recognition, CVPR 2021, virtual, June 19-25, 2021*, pp.
 745 7892–7900. Computer Vision Foundation / IEEE, 2021. doi: 10.1109/CVPR46437.2021.00780.
 746 URL https://openaccess.thecvf.com/content/CVPR2021/html/Rezaei_On_the_Difficulty_of_Membership_Inference_Attacks_CVPR_2021_paper.html.

749 Nicol N. Schraudolph. Fast Curvature Matrix-Vector Products for Second-Order Gradient Descent.
 750 *Neural Comput.*, 14(7):1723–1738, 2002. doi: 10.1162/08997660260028683. URL <https://doi.org/10.1162/08997660260028683>.

753 Reza Shokri, Marco Stronati, Congzheng Song, and Vitaly Shmatikov. Membership Inference At-
 754 tacks Against Machine Learning Models. In *2017 IEEE Symposium on Security and Privacy,
 755 SP 2017, San Jose, CA, USA, May 22-26, 2017*, pp. 3–18. IEEE Computer Society, 2017. doi:
 10.1109/SP.2017.41. URL <https://doi.org/10.1109/SP.2017.41>.

756 Christoforos N. Spartalis, Theodoros Semertzidis, Efstratios Gavves, and Petros Daras. Lo-
 757 TUS: Large-Scale Machine Unlearning with a Taste of Uncertainty. In *Proceedings of the*
 758 *IEEE/CVF Conference on Computer Vision and Pattern Recognition.*, 2025. URL <https://cvpr.thecvf.com/virtual/2025/poster/33292>.

759

760 Ayush K. Tarun, Vikram S. Chundawat, Murari Mandal, and Mohan S. Kankanhalli. Fast Yet Ef-
 761 fective Machine Unlearning. *IEEE Trans. Neural Networks Learn. Syst.*, 35(9):13046–13055, 2024.
 762 doi: 10.1109/TNNLS.2023.3266233. URL <https://doi.org/10.1109/TNNLS.2023.3266233>.

763

764

765 Lingzhi Wang, Tong Chen, Wei Yuan, Xingshan Zeng, Kam-Fai Wong, and Hongzhi Yin. KGA:
 766 A General Machine Unlearning Framework Based on Knowledge Gap Alignment. In Anna
 767 Rogers, Jordan L. Boyd-Graber, and Naoaki Okazaki (eds.), *Proceedings of the 61st Annual*
 768 *Meeting of the Association for Computational Linguistics (Volume 1: Long Papers), ACL 2023,*
 769 *Toronto, Canada, July 9-14, 2023*, pp. 13264–13276. Association for Computational Linguistics,
 770 2023. doi: 10.18653/V1/2023.ACL-LONG.740. URL <https://doi.org/10.18653/v1/2023.acl-long.740>.

771

772 Sheng-Yu Wang, Aaron Hertzmann, Alexei A. Efros, Jun-Yan Zhu, and Richard Zhang. Data Attri-
 773 bution for Text-to-Image Models by Unlearning Synthesized Images. In Amir Globersons, Lester
 774 Mackey, Danielle Belgrave, Angela Fan, Ulrich Paquet, Jakub M. Tomczak, and Cheng Zhang
 775 (eds.), *Advances in Neural Information Processing Systems 38: Annual Conference on Neural*
 776 *Information Processing Systems 2024, NeurIPS 2024, Vancouver, BC, Canada, December 10 -*
 777 *15, 2024*, 2024. URL http://papers.nips.cc/paper_files/paper/2024/hash/07fbde96bee50f4e09303fd4f877c2f3-Abstract-Conference.html.

778

779 Haonan Yan, Xiaoguang Li, Ziyao Guo, Hui Li, Fenghua Li, and Xiaodong Lin. ARCANe: An Effi-
 780 cient Architecture for Exact Machine Unlearning. In *Proceedings of the Thirty-First International*
 781 *Joint Conference on Artificial Intelligence*, pp. 4006–4013, Vienna, Austria, July 2022. Interna-
 782 tional Joint Conferences on Artificial Intelligence Organization. ISBN 978-1-956792-00-3. doi:
 783 10.24963/ijcai.2022/556. URL <https://www.ijcai.org/proceedings/2022/556>.

784

785 Jie Zhang, Debeshee Das, Gautam Kamath, and Florian Tramèr. Position: Membership Inference
 786 Attacks Cannot Prove That a Model was Trained on Your Data. In *IEEE Conference on Secure*
 787 *and Trustworthy Machine Learning, SaTML 2025, Copenhagen, Denmark, April 9-11, 2025*, pp.
 788 333–345. IEEE, 2025. doi: 10.1109/SATML64287.2025.00025. URL <https://doi.org/10.1109/SaTML64287.2025.00025>.

789

790 Yongjing Zhang, Zhaobo Lu, Feng Zhang, Hao Wang, and Shaojing Li. Machine Unlearning by
 791 Reversing the Continual Learning. *Applied Sciences*, 13(16), 2023. ISSN 2076-3417. doi: 10.
 792 3390/app13169341. URL <https://www.mdpi.com/2076-3417/13/16/9341>.

793

794 Yu Zhou, Dian Zheng, Qijie Mo, Renjie Lu, Kun-Yu Lin, and Wei-Shi Zheng. Decoupled Distil-
 795 lation to Erase: A General Unlearning Method for Any Class-centric Tasks. *Proceedings of the*
 796 *IEEE/CVF Conference on Computer Vision and Pattern Recognition (CVPR)*, pp. 20350–20359,
 2025.

797

798 Zhanke Zhou, Jianing Zhu, Fengfei Yu, Xuan Li, Xiong Peng, Tongliang Liu, and Bo Han. Model
 799 Inversion Attacks: A Survey of Approaches and Countermeasures. *CoRR*, abs/2411.10023, 2024.
 800 doi: 10.48550/ARXIV.2411.10023. URL <https://doi.org/10.48550/arXiv.2411.10023>. arXiv: 2411.10023.

801

802

803

804

805

806

807

808

809

APPENDIX

A PROPERTIES OF MAXIMIZING KL DIVERGENCE

Setup. Let the teacher and student produce temperature-scaled probability distributions

$$\mathbf{p} = \text{softmax}\left(\frac{\mathbf{p}_{\text{logits}}}{\tau}\right), \quad \mathbf{q} = \text{softmax}\left(\frac{\mathbf{q}_{\text{logits}}}{\tau}\right),$$

where $\mathbf{p}_{\text{logits}} = \mathcal{M}_{\theta_o}(\mathbf{x}) \in \mathbb{R}^C$ and $\mathbf{z} \triangleq \mathbf{q}_{\text{logits}} = \mathcal{M}_{\theta_u}(\mathbf{x}) \in \mathbb{R}^C$. The unlearning objective being maximized in SCRUB+R is:

$$\theta_u^* = \arg \max_{\theta_u} D_{KL}(\mathbf{p} \parallel \mathbf{q}).$$

Lemma 1 (Gradient wrt. student parameters). *The gradient of the KL divergence with respect to student parameters θ_u can be written as*

$$\frac{\partial D_{KL}(\mathbf{p} \parallel \mathbf{q})}{\partial \theta_u} = \frac{1}{\tau} (\mathbf{q} - \mathbf{p}) \frac{\partial \mathbf{z}}{\partial \theta_u} \quad (9)$$

Proof. Starting from the loss and applying the chain rule:

$$\frac{\partial D_{KL}(\mathbf{p} \parallel \mathbf{q})}{\partial \theta_u} = \frac{\partial D_{KL}(\mathbf{p} \parallel \mathbf{q})}{\partial \mathbf{q}} \frac{\partial \mathbf{q}}{\partial \mathbf{z}} \frac{\partial \mathbf{z}}{\partial \theta_u}$$

The gradient wrt. student probabilities is given as:

$$\frac{\partial D_{KL}(\mathbf{p} \parallel \mathbf{q})}{\partial q_j} = \frac{\partial}{\partial q_j} \sum_{i=1}^C p_i \log \frac{p_i}{q_i} = -\frac{p_j}{q_j}, \quad \frac{\partial D_{KL}(\mathbf{p} \parallel \mathbf{q})}{\partial \mathbf{q}} = \left[-\frac{p_1}{q_1}, \dots, -\frac{p_C}{q_C} \right].$$

Next, we need to determine the Jacobian of \mathbf{q} and we begin by finding its diagonal elements using the quotient rule:

$$\begin{aligned} \frac{\partial q_i}{\partial z_i} &= \frac{\frac{1}{\tau} \exp(z_i/\tau) \sum_{j=1}^C \exp(z_j/\tau) - \exp(z_i/\tau) \frac{1}{\tau} \exp(z_i/\tau)}{\left(\sum_{j=1}^C \exp(z_j/\tau)\right)^2} \\ &= \frac{\frac{1}{\tau} \exp(z_i/\tau) (S - \exp(z_i/\tau))}{S^2} \\ &= \frac{1}{\tau} \frac{\exp(z_i/\tau)}{S} \frac{S - \exp(z_i/\tau)}{S} \\ &= \frac{1}{\tau} q_i (1 - q_i) \end{aligned}$$

And considering the case where we compute $\frac{\partial q_i}{\partial z_j}$, $i \neq j$ we get:

$$\begin{aligned} \frac{\partial q_i}{\partial z_j} &= \frac{-\exp(z_i/\tau) \cdot \frac{1}{\tau} \exp(z_j/\tau)}{S^2} \\ &= -\frac{1}{\tau} \frac{\exp(z_i/\tau)}{S} \frac{\exp(z_j/\tau)}{S} \\ &= -\frac{1}{\tau} q_i q_j \end{aligned}$$

Putting this together, we get that the Jacobian of \mathbf{q} is:

$$\frac{\partial q_i}{\partial z_j} = \begin{cases} \frac{1}{\tau} q_i (1 - q_i), & i = j, \\ -\frac{1}{\tau} q_i q_j, & i \neq j, \end{cases} \quad \frac{\partial \mathbf{q}}{\partial \mathbf{z}} = \frac{1}{\tau} \begin{bmatrix} q_1(1 - q_1) & -q_1 q_2 & \dots & -q_1 q_C \\ -q_2 q_1 & q_2(1 - q_2) & \dots & -q_2 q_C \\ \vdots & \vdots & \ddots & \vdots \\ -q_C q_1 & -q_C q_2 & \dots & q_C(1 - q_C) \end{bmatrix}$$

864 Next, the product of the first two terms in the chain rule is determined. The j 'th row is given as:
 865

$$866 \quad \frac{\partial D_{KL}(\mathbf{p} \parallel \mathbf{q})}{\partial \mathbf{q}} \frac{\partial \mathbf{q}}{\partial z_j} = \frac{1}{\tau} \sum_{i=1}^C -\frac{p_i}{q_i} q_i (\delta_{ij} - q_j) \quad (10)$$

$$869 \quad = -\frac{1}{\tau} \sum_{i=1}^C p_i (\delta_{ij} - q_j) \quad (11)$$

$$872 \quad = -\frac{1}{\tau} \left(\sum_{i=1}^C p_i \delta_{ij} - \sum_{i=1}^C p_i q_j \right) \quad (12)$$

$$875 \quad = -\frac{1}{\tau} \left(p_j - q_j \sum_{i=1}^C p_i \right) \quad (13)$$

$$878 \quad = -\frac{1}{\tau} (p_j - q_j) \quad (14)$$

$$880 \quad = \frac{1}{\tau} (q_j - p_j) \quad (15)$$

882 (16)

883 Thus, we arrive at:

$$884 \quad \frac{\partial D_{KL}(\mathbf{p} \parallel \mathbf{q})}{\partial \mathbf{q}} \frac{\partial \mathbf{q}}{\partial \mathbf{z}} = \frac{1}{\tau} (\mathbf{q} - \mathbf{p})$$

886 \square

888 **Assumption 1** (Model activations have an unbounded codomain). *Assume that the activation function of \mathcal{M} has an unbounded codomain. As a result, \mathcal{M} can produce arbitrarily large logits.*

890 **Proposition 1** (Parameter norm diverges without bounding). *Maximizing $D_{KL}(\mathbf{p} \parallel \mathbf{q})$ without bounding components of \mathbf{q} admits no finite critical point for logits \mathbf{z} . Consequently, gradient ascent causes the norm of the student parameters to diverge $\|\theta_u\| \rightarrow \infty$.*

894 *Sketch.* From Lemma 1, the gradient at the logits level is proportional to $\mathbf{q} - \mathbf{p}$. For any class j with
 895 $p_j > 0$, the KL objective pushes $q_j \rightarrow 0$, requiring $z_j \rightarrow -\infty$ or other logits $z_i \rightarrow +\infty$. Because
 896 $\mathbf{q} - \mathbf{p}$ has nonzero magnitude, this produces a constant gradient in parameter space. Gradient ascent
 897 on this signal increases $\|\theta_u\|$ without bound. \square

900 **Definition 1** (Bounded student probabilities). *For $\epsilon > 0$, define*

$$901 \quad \tilde{q}_i = \max(\epsilon, q_i). \quad (17)$$

903 **Proposition 2** (KL-divergence under bounded probabilities). *For student probabilities $\tilde{\mathbf{q}}$, bounded
 904 using Equation 17, the objective becomes upper bounded by:*

$$905 \quad D_{KL}(\mathbf{p} \parallel \tilde{\mathbf{q}}) = \sum_i p_i \log \frac{p_i}{\tilde{q}_i} \leq -H(\mathbf{p}) + \log \frac{1}{\epsilon}.$$

908 **Lemma 2** (Gradient with bounding). *Defining the set of active classes $\mathcal{A} = \{k \mid q_k > \epsilon\}$ and the
 909 corresponding teacher probability mass $P_{\mathcal{A}} = \sum_{k \in \mathcal{A}} p_k$. Then*

$$911 \quad \frac{\partial D_{KL}(\mathbf{p} \parallel \tilde{\mathbf{q}})}{\partial z_j} = \begin{cases} \frac{1}{\tau} (q_j P_{\mathcal{A}} - p_j), & j \in \mathcal{A}, \\ \frac{1}{\tau} (q_j P_{\mathcal{A}}), & j \notin \mathcal{A}. \end{cases}$$

914 *Proof.* Let $\mathbb{1}(\cdot)$ denote the indicator function. We begin by computing the gradient of the loss with
 915 respect to unbounded student probabilities:

$$916 \quad \frac{\partial D_{KL}(\mathbf{p} \parallel \tilde{\mathbf{q}})}{\partial q_j} = \begin{cases} -\frac{p_j}{q_j} & q_j > \epsilon \\ 0 & q_j \leq \epsilon \end{cases} \quad \frac{\partial D_{KL}(\mathbf{p} \parallel \tilde{\mathbf{q}})}{\partial \mathbf{q}} = \left[\mathbb{1}(q_1 \geq \epsilon) \frac{-p_1}{q_1}, \dots, \mathbb{1}(q_C \geq \epsilon) \frac{-p_C}{q_C} \right]$$

918 The product of the first two terms in the chain rule becomes:
 919

$$\begin{aligned}
 \frac{\partial D_{KL}(\mathbf{p} \parallel \tilde{\mathbf{q}})}{\partial \mathbf{q}} \frac{\partial \mathbf{q}}{\partial z_j} &= \frac{1}{\tau} \sum_{i=1}^C \mathbb{1}(q_i \geq \epsilon) \frac{-p_i}{q_i} q_i (\delta_{ij} - q_j) \\
 &= -\frac{1}{\tau} \sum_{i \in \mathcal{A}} \frac{p_i}{q_i} q_i (\delta_{ij} - q_j) \\
 &= -\frac{1}{\tau} \sum_{i \in \mathcal{A}} p_i (\delta_{ij} - q_j) \\
 &= -\frac{1}{\tau} \left(\sum_{i \in \mathcal{A}} p_i \delta_{ij} - \sum_{i \in \mathcal{A}} p_i q_j \right) \\
 &= -\frac{1}{\tau} \left(p_j \mathbb{1}(j \in \mathcal{A}) - q_j \sum_{i \in \mathcal{A}} p_i \right) \\
 &= \frac{1}{\tau} (q_j P_{\mathcal{A}} - p_j \mathbb{1}(j \in \mathcal{A}))
 \end{aligned}$$

□

938 **Corollary 1** (Gradient vanishing in the unlearning limit). *If the student suppresses all teacher-
 939 supported classes, i.e., $q_k \leq \epsilon$ for all k where $p_k > 0$, then $P_{\mathcal{A}} \rightarrow 0$ and*

$$\lim_{P_{\mathcal{A}} \rightarrow 0} \left\| \frac{\partial D_{KL}(\mathbf{p} \parallel \tilde{\mathbf{q}})}{\partial \mathbf{z}} \right\| = 0.$$

943 *Remark.* Bounding introduces an automatic stopping mechanism: once student probabilities for
 944 teacher-supported classes fall below ϵ , the effective gradient vanishes, preventing runaway parameter
 945 magnitudes.

947 B EXPERIMENT DETAILS

949 This section outlines additional implementation details surrounding the experiments. Generally, all
 950 experiments were carried out on a single V100 GPU and seeds were used for reproducibility.

951 **FIM ratio and numeric stability:** When computing the FIM ratio (Equation 7), zero or near-zero
 952 denominators can cause instabilities. For parameters with $f_j^{(\mathcal{D}_r)} / f_j^{(\mathcal{D}_f)}$ undefined due to $f_j^{(\mathcal{D}_f)} = 0$,
 953 we replace the ratio with the maximum observed value within that model layer. This corresponds
 954 to treating such parameters as highly protected, since they provide no information about the forget
 955 set and should not serve as “free variables” for absorbing forgetting updates. An alternative is to
 956 set weights for 0/0 cases to 1, thereby leaving irrelevant parameters unconstrained; both choices are
 957 defensible, and we adopt the more restrictive option to enforce that forgetting occurs only through
 958 parameters implicated in the forget set. For near-zero denominators, we clip all ratios at 10^6 . This
 959 preserves relative importance rankings while preventing unbounded weights. In practice, results are
 960 not sensitive to the choice of upper bound, since the other terms in the loss remain bounded.

962 B.1 CIFAR AND PINS FACE RECOGNITION

964 For all experiments on CIFAR-10, CIFAR-100, and Pins Face Recognition, we use a vision trans-
 965 former (Dosovitskiy et al., 2021) pre-trained on ImageNet (Deng et al., 2009) with mean pooling
 966 and a single classification layer on top². Each model was trained for 20 epochs and a batch size of
 967 128. AdamW was used as the optimizer with a learning rate of 10^{-4} , weight decay of 10^{-3} , and a
 968 cosine annealing learning rate scheduler with a period of 20 epochs. The final model was chosen as
 969 the one with the highest accuracy on the validation set. This architecture and training configuration
 970 was kept constant for all original and retrained models.

971 ²The specific instance of ViT model being used is the tiny variant found here:
 972 <https://huggingface.co/WinKawaks/vit-tiny-patch16-224>

972 For all experiments, we preprocess the images by resizing them to 224×224 using bilinear
 973 interpolation, re-scale the pixels to $[0, 1]$ by performing element-wise division with 255. Hereafter,
 974 we normalize them using the channel-wise mean and standard deviation of the training set, and
 975 converting labels to one-hot vectors.

976 For CIFAR-10 and CIFAR-100 we apply the CIFAR-10 AutoAugment policy for data augmentation
 977 described in Cubuk et al. (2019). For Pins Face Recognition, we use the following sequence of
 978 random augmentations: resized cropping, horizontal flipping with a 50% probability, a random
 979 rotation in the interval $[-10^\circ, 10^\circ]$, color jitter, and erasure. For all datasets, we apply channel-wise
 980 normalization after augmenting the training images. Augmentations are only performed during the
 981 training of the original and retrained models. Hence, at unlearning time the only transformation
 982 being applied to the training and retain datasets is normalization.

984 B.1.1 HYPERPARAMETER SWEEPS

985 To select hyperparameters, we use Optuna and run 30 trials for each unlearning method per forget
 986 set. An overview of the forget sets constructed for hyperparameter search as well as the downstream
 987 forget set can be found in Table 2.

988 We generally keep the upper and lower bounds of hyperparameters fixed for unlearning method and
 989 task in Table 2. One exception to this is with the number of total rounds for Teacher Ascent. Since
 990 the number of optimization steps scales with the size of the forget set, we change the bounds on the
 991 number of total rounds to have a similar number of total optimization steps for each unlearning task.
 992 During hyperparameter search, we seek to find a model that matches the retrained model accuracy
 993 on the forget and retain set as closely as possible.

996 B.1.2 CORRUPTED DATA

997 To avoid any confusion, we detail the exact procedure used for unlearning mislabeled data. We first
 998 draw 200 points from the automobile class and mislabel them as a truck. Hereafter, 10 original models
 999 are trained on the entire dataset including mislabeled data followed by 10 retrained models on
 1000 the retain data (excluding mislabeled points entirely). Hereafter, unlearning is applied "as normal"
 1001 e.g., no information about the data being mislabeled nor which class it actually belongs to.

1002 During hyperparameter selection, the following is done: We draw 200 points from the boat class
 1003 and mislabel them as a plane. We then train a single original model on the entire dataset including
 1004 mislabeled data and a single retrained model on the retain dataset only. When unlearning, the forget
 1005 loader still contains the corrupted labels e.g., when calculating the FIM as well as optimizing any ob-
 1006 jectives iterating over the forget set. When calculating the objective function for the hyperparameter
 1007 sweep, the true labels are used for the forget set.

1010 B.2 MNIST

1011 All original and retrained models on MNIST have the same architecture and model parameters. We
 1012 use a neural network with 3 hidden layers, a hidden dimension of 3136, and residual skip connections
 1013 between hidden layers. It was optimized using cross-entropy with Adam where we set weight decay
 1014 to 0 a set learning rate of 10^{-3} . Each model was trained for 30 epochs and the final model was
 1015 chosen as the one with the highest validation accuracy. As part of data preprocessing, we min-max
 1016 normalize the pixel values using the mean and standard deviation of the training set. Additionally,
 1017 each 28×28 pixel image is flattened into a 784-dimensional vector. Lastly, the integer labels are
 1018 converted into 10-dimensional one-hot encoded vectors.

1019 For the MNIST experiments, we deliberately decided not to perform an expensive hyperparameter
 1020 search. Rather, we specified sensible parameters and repeated the experiments to gauge the consis-
 1021 tency of the results. This was chosen to resemble a practical unlearning scenario where one has a
 1022 general idea about what parameters might be reasonable.

1023 Specifically, we chose to run Teacher Ascent with 50% of the total epochs containing the maximiza-
 1024 tion step. The learning rate was set to 10^{-3} , the same as when training the original model. For the
 1025 distilled KL temperatures, we set $\tau_f = \tau_e = 2$ and $\tau_r = 5$.

1026 For SCRUB+R, we set the temperatures to $\tau_f = \tau_r = 2$, use a learning rate of 10^{-3} , and regular-
1027 ization strengths to $\alpha = \gamma = 2$.

1028 The hyperparameters of SCRUB+R and TA were kept constant for all of the results provided on
1029 MNIST.

1031

1032

1033

1034

1035

1036

1037

1038

1039

1040

1041

1042

1043

1044

1045

1046

1047

1048

1049

1050

1051

1052

1053

1054

1055

1056

1057

1058

1059

1060

1061

1062

1063

1064

1065

1066

1067

1068

1069

1070

1071

1072

1073

1074

1075

1076

1077

1078

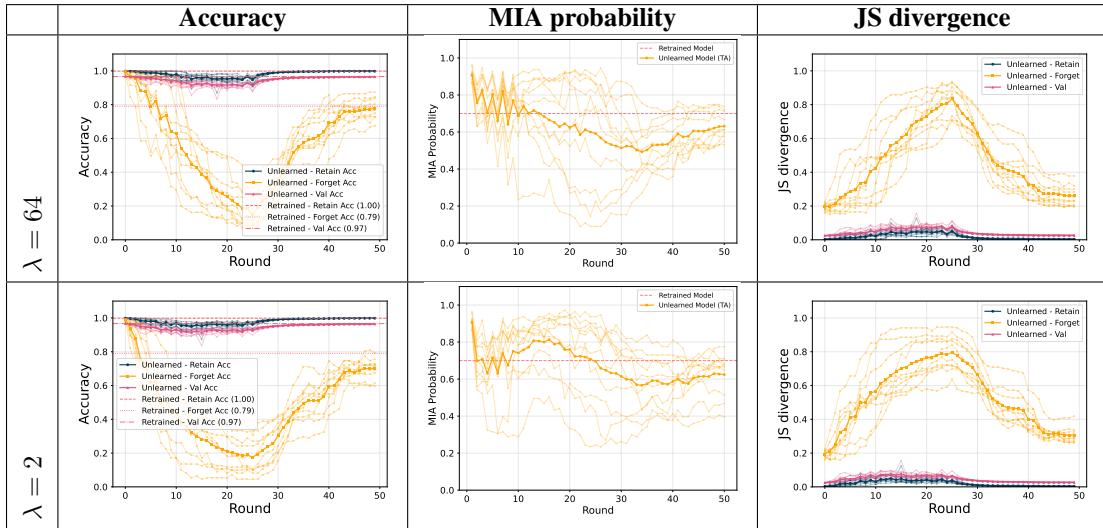
1079

1080 C EXTENDED MNIST RESULTS
1081

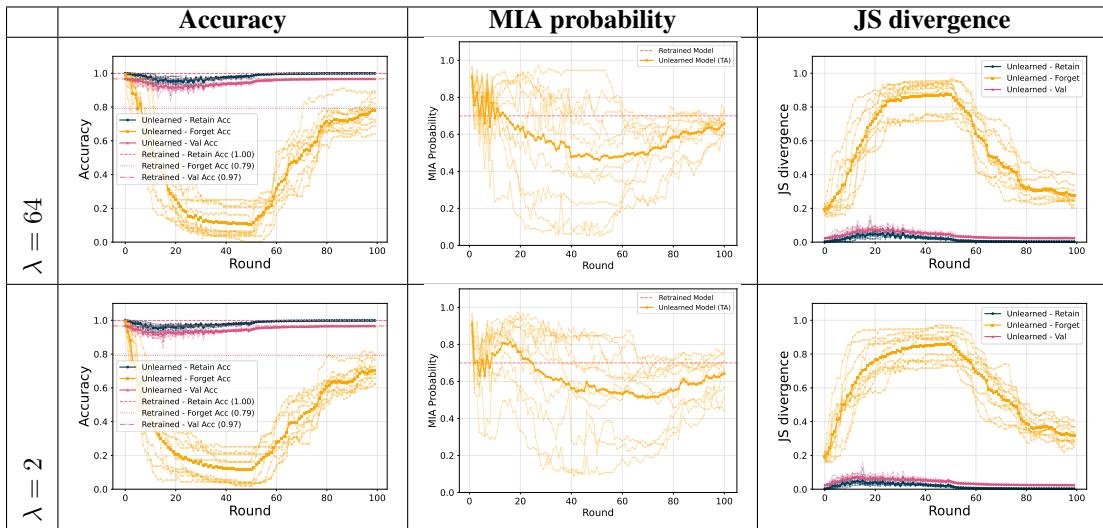
1082 Here we report additional results on the MNIST dataset. Each plots show the trajectory of 10 runs of
1083 Teacher Ascent during unlearning with different model seeds. The lines corresponding to a retrained
1084 model are the mean of the 10 retrained models across seeds. The three forget sets, seen in Table 1,
1085 were held constant.

1086
1087 C.1 T-SNE FORGET SET 1
1088

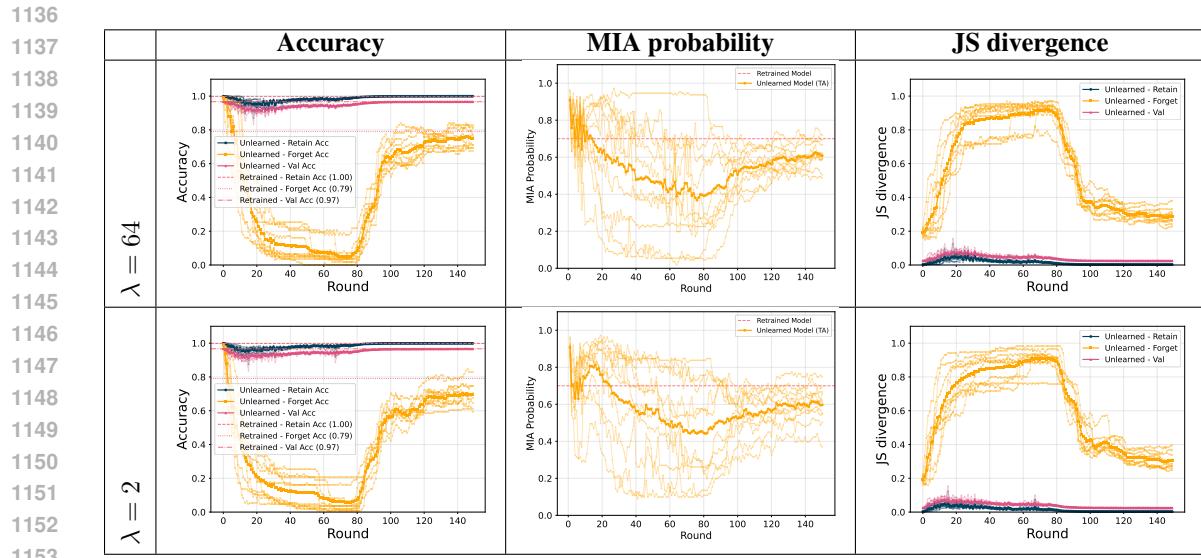
1089 Table 4: Accuracies, MIA probabilities and Jensen-Shannon divergences for Teacher Ascent when
1090 run on t-SNE forget set 1 for 50 total rounds.



1109 Table 5: Accuracies, MIA probabilities and Jensen-Shannon divergences for Teacher Ascent when
1110 run on t-SNE forget set 1 for 100 total rounds.

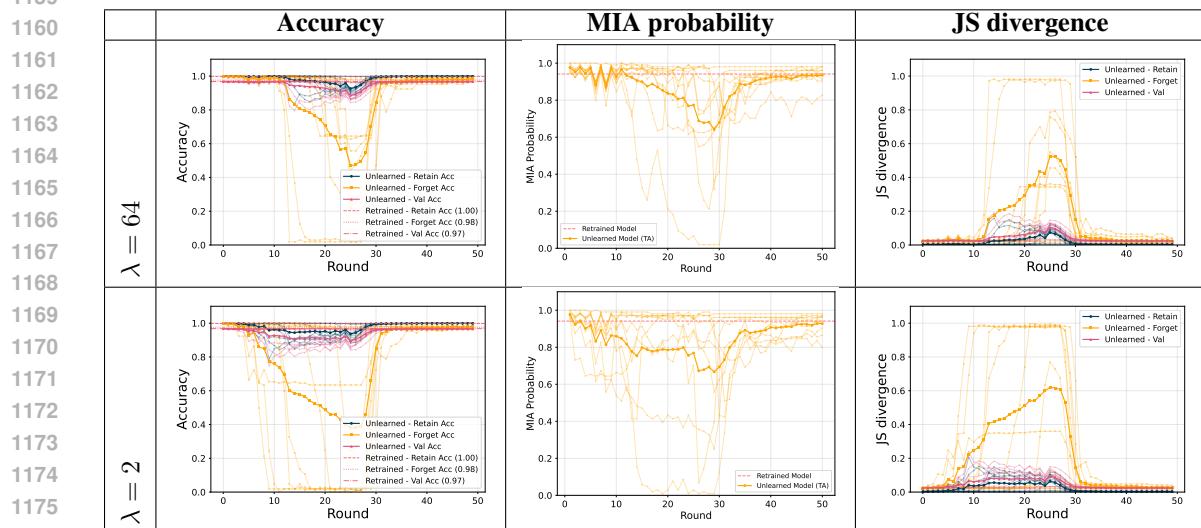


1134 Table 6: Accuracies, MIA probabilities and Jensen-Shannon divergences for Teacher Ascent when
 1135 run on t-SNE forget set 1 for 150 total rounds.



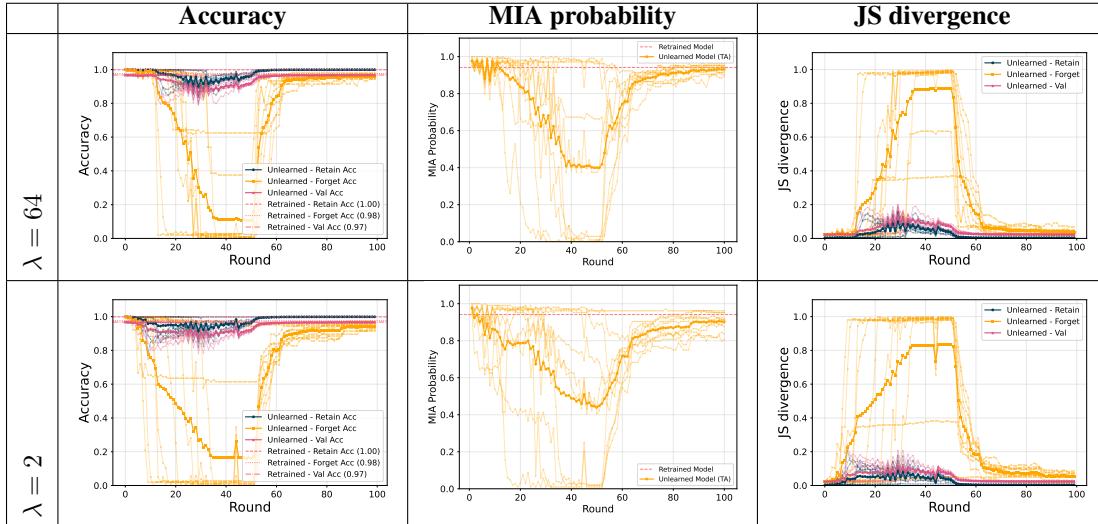
1155 C.2 t-SNE FORGET SET 2

1156 Table 7: Accuracies, MIA probabilities and Jensen-Shannon divergences for Teacher Ascent when
 1157 run on t-SNE forget set 2 for 50 total rounds.



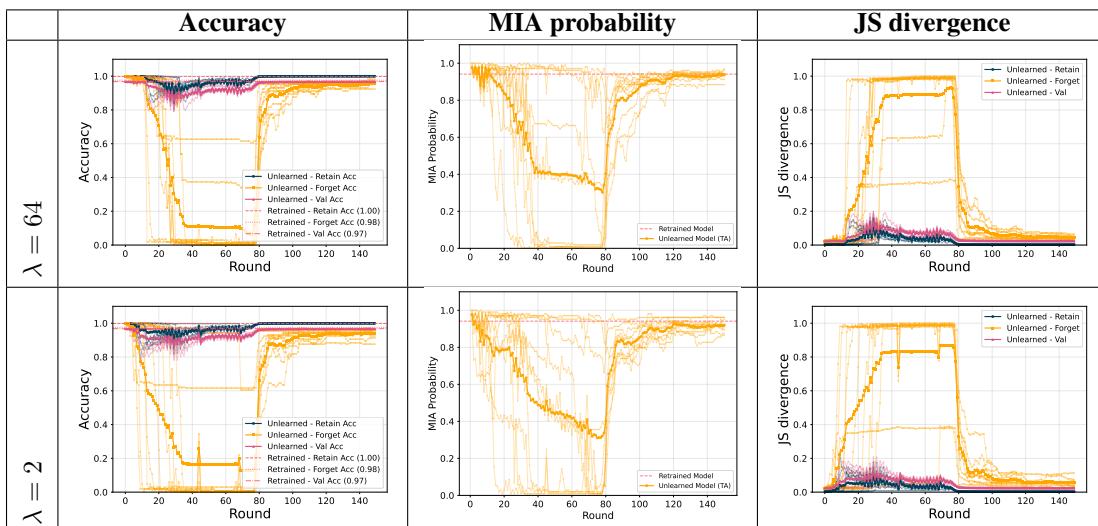
1188
1189
1190
1191

Table 8: Accuracies, MIA probabilites and Jensen-Shannon divergences for Teacher Ascent when run on t-SNE forget set 2 for 100 total rounds.

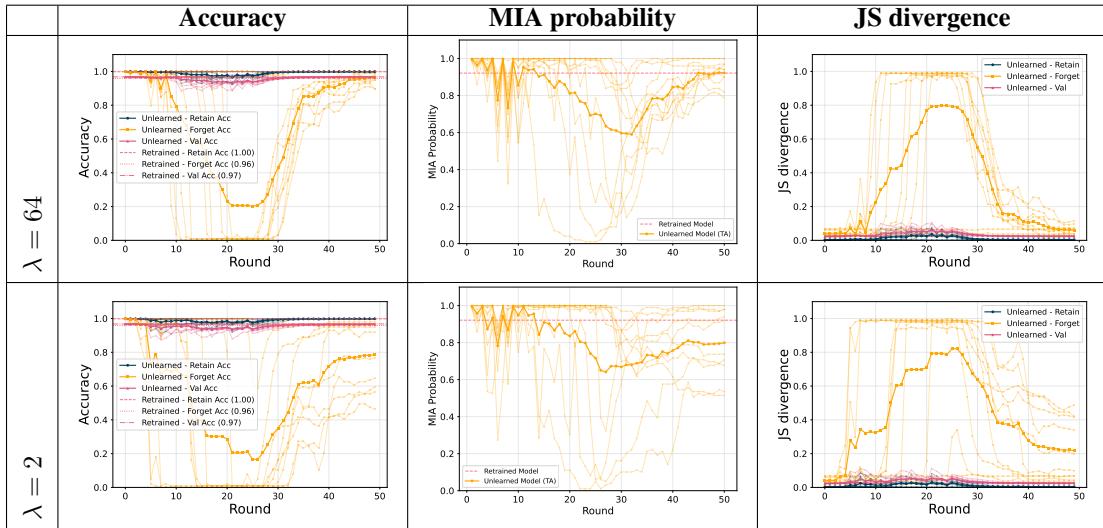
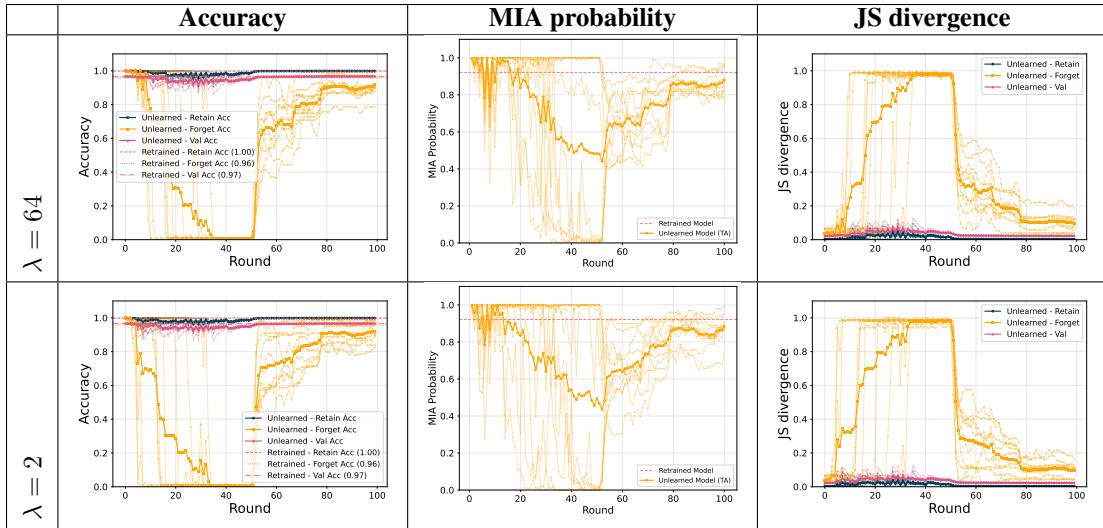


1211
1212
1213
1214
1215
1216
1217
1218
1219
1220
1221

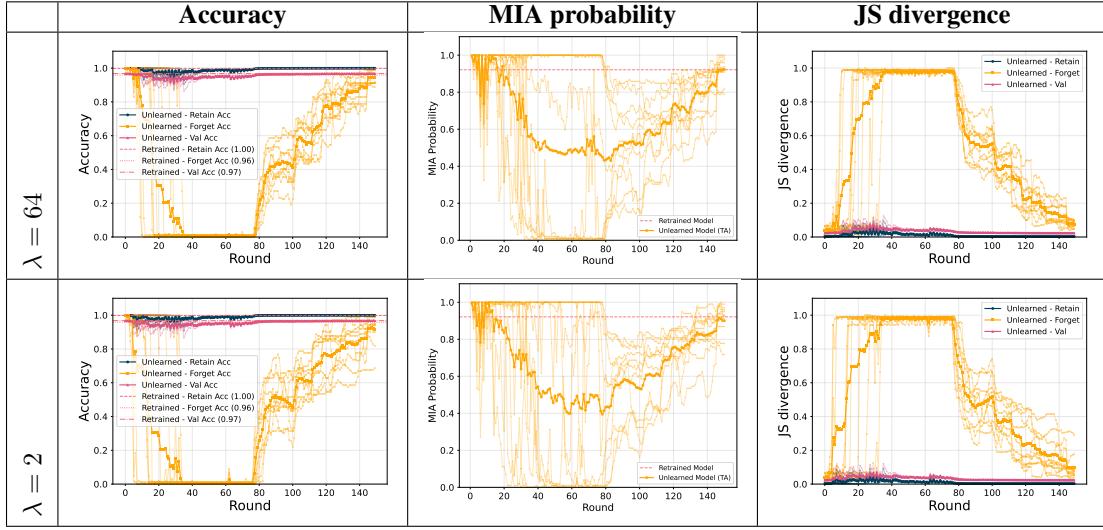
Table 9: Accuracies, MIA probabilities and Jensen-Shannon divergences for Teacher Ascent when run on t-SNE forget set 2 for 150 total rounds.



1238
1239
1240
1241

1242 C.3 t-SNE FORGET SET 3
12431244 Table 10: Accuracies, MIA probabilites and Jensen-Shannon divergences for Teacher Ascent when
1245 run on t-SNE forget set 3 for 50 total rounds.
12461247 Table 11: Accuracies, MIA probabilites and Jensen-Shannon divergences for Teacher Ascent when
1248 run on t-SNE forget set 3 for 100 total rounds.
1249

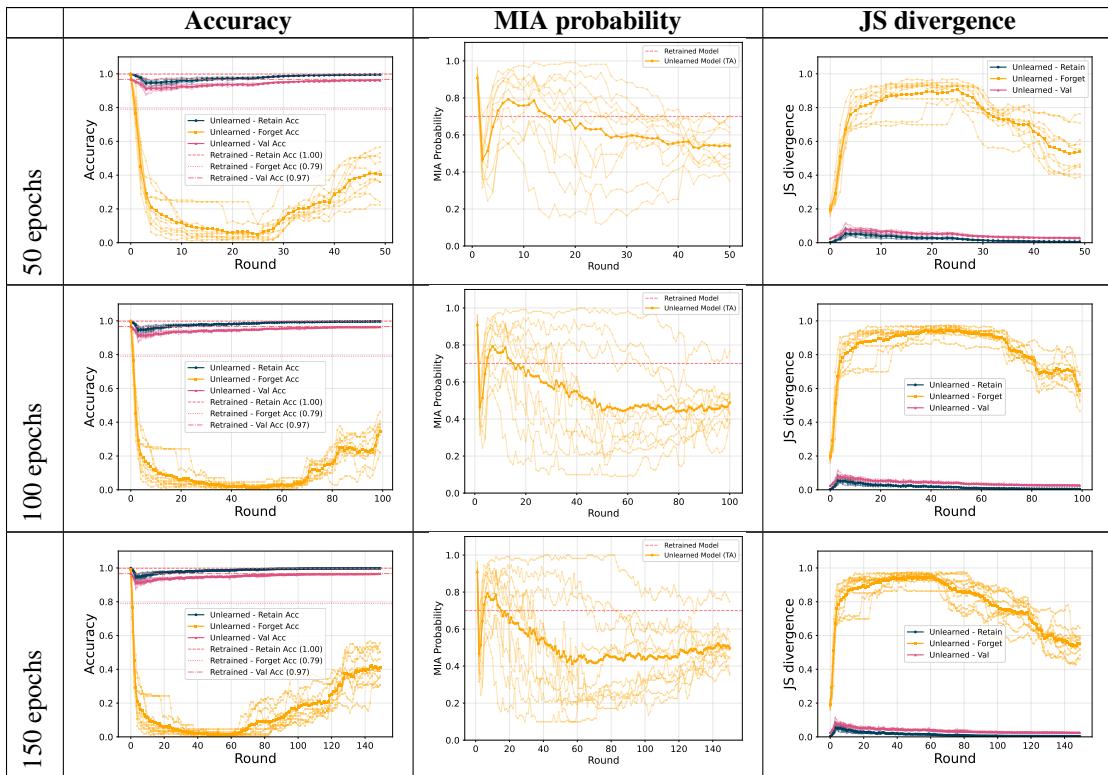
1296 Table 12: Accuracies, MIA probabilities and Jensen-Shannon divergences for Teacher Ascent when
 1297 run on t-SNE forget set 3 for 150 total rounds.
 1298



1317 C.4 ABLATION: THE EFFECT OF PROTECTING GENERALIZATION

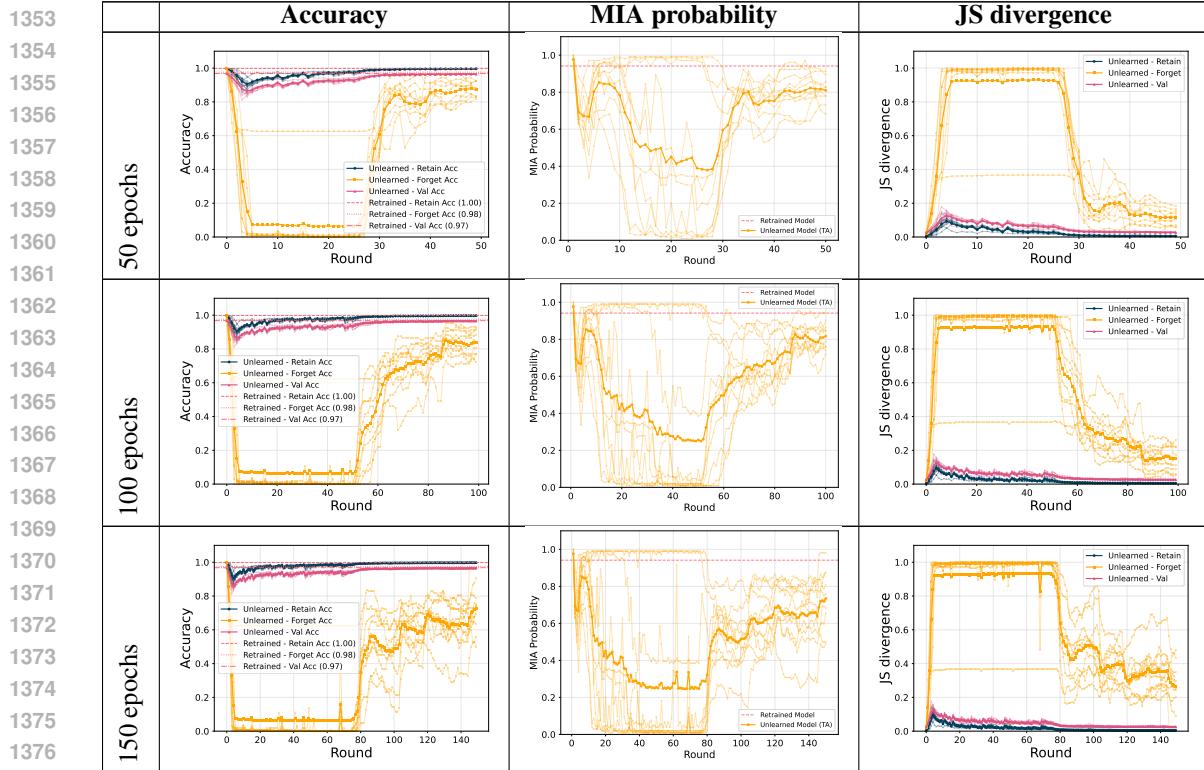
1319 Here we assess whether regularizing with the Fisher Information Matrix during the maximization
 1320 step is beneficial.
 1321

1322 Table 13: Accuracies, MIA probabilities, and Jensen-Shannon divergences on t-SNE forget set 1
 1323 when setting the regularization strength to $\lambda = 0$.
 1324



1350
 1351 Table 14: Accuracies, MIA probabilities, and Jensen-Shannon divergences on t-SNE forget set 2
 1352 when setting the regularization strength to $\lambda = 0$.

1352



1377

1378

1379

1380

1381

1382

1383

1384

1385

1386

1387

1388

1389

1390

1391

1392

1393

1394

1395

1396

1397

1398

1399

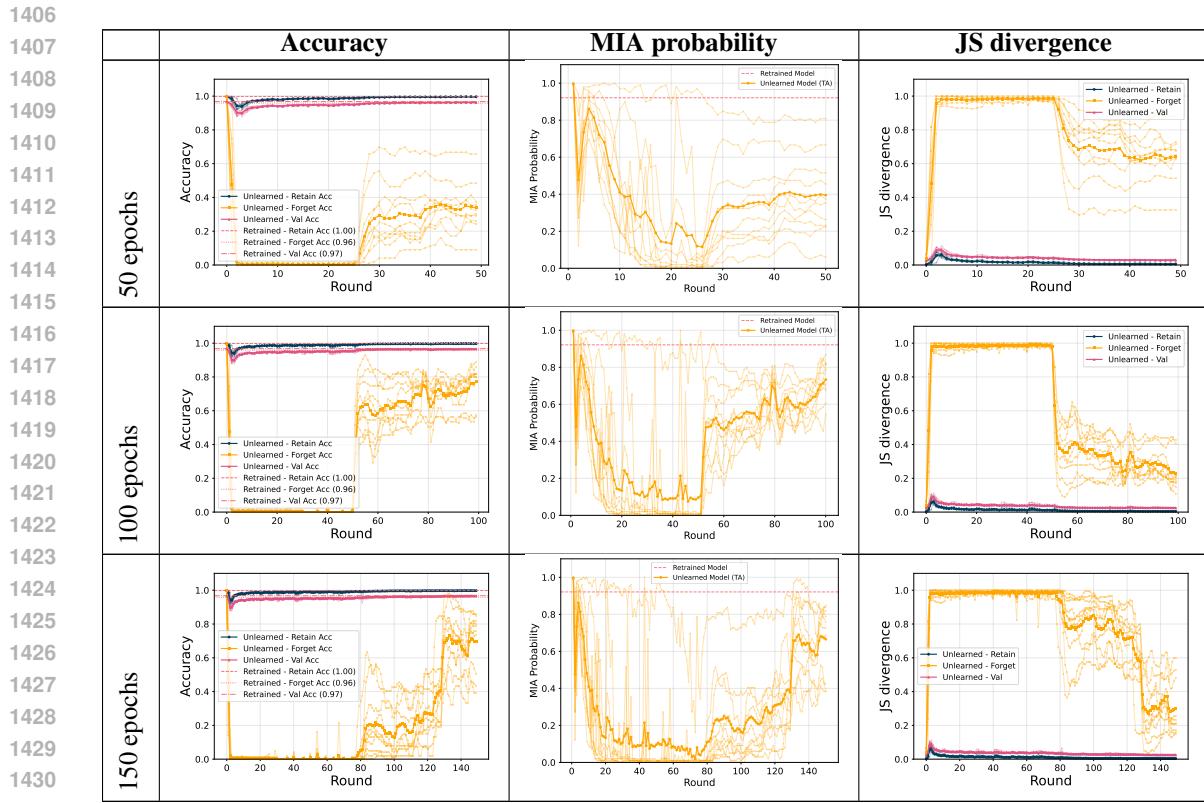
1400

1401

1402

1403

1404
 1405 Table 15: Accuracies, MIA probabilities, and Jensen-Shannon divergences on t-SNE forget set 3
 1406 when setting the regularization strength to $\lambda = 0$.



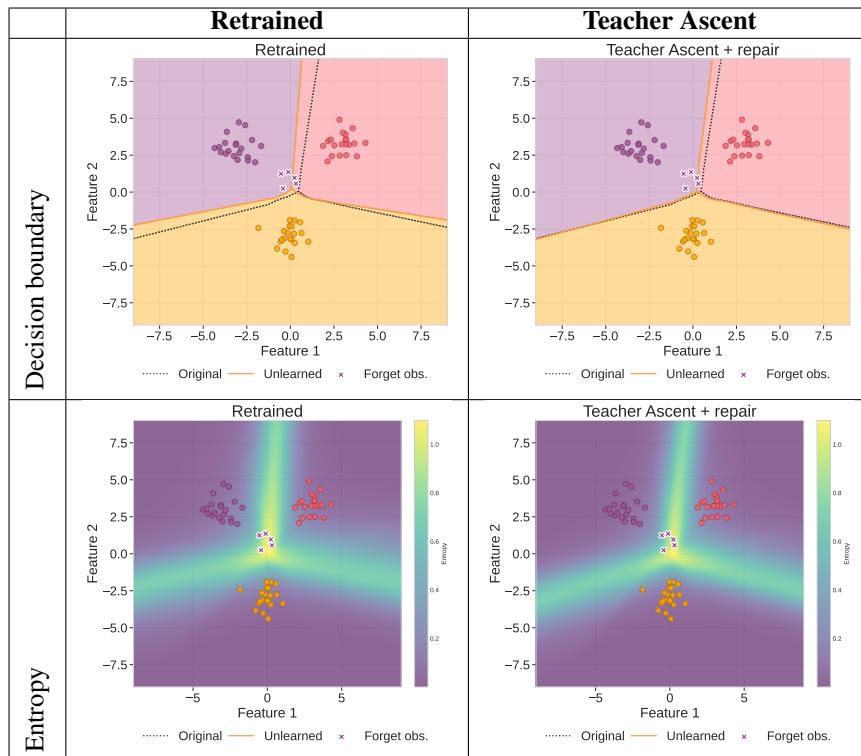
1431
 1432
 1433
 1434
 1435
 1436
 1437
 1438
 1439
 1440
 1441
 1442
 1443
 1444
 1445
 1446
 1447
 1448
 1449
 1450
 1451
 1452
 1453
 1454
 1455
 1456
 1457

1458
1459**D CONTROLLED SETTING EXPERIMENTS**1460
1461
1462
1463
1464
1465

Here we report some additional results of Teacher Ascent in a controlled setting with three linearly separable classes. A small neural network was used, of similar architecture to the one in MNIST. All hyperparameters were kept the same as in the MNIST experiments except setting $\tau_e = 0.01$. We found this slightly improved performance in adversarial settings (scenarios 3 and 5) but setting $\tau_e = 2$ still performed comparatively. We suspect that shrinking the influence of the entropy term works well in these settings is due to the original model being highly uncertain on forget points.

1466
1467

Table 16: Controlled setting results for unlearning scenario 1.

1468
1469
1470
1471
1472
1473
1474
1475
1476
1477
1478
1479
14801492
1493
1494
1495
1496
1497
1498
1499
1500
1501
1502
1503
1504
1505
1506
1507
1508
1509
1510
1511

1512

Table 17: Controlled setting results for unlearning scenario 2.

1513

1514

1515

1516

1517

1518

1519

1520

1521

1522

1523

1524

1525

1526

1527

1528

1529

1530

1531

1532

1533

1534

1535

1536

1537

1538

1539

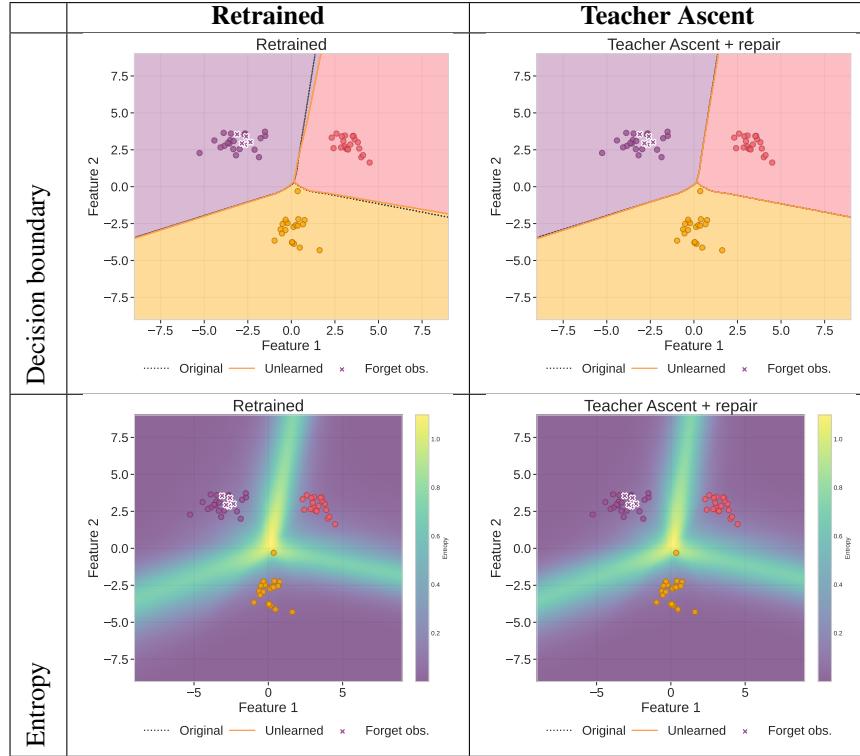


Table 18: Controlled setting results for unlearning scenario 3.

1540

1541

1542

1543

1544

1545

1546

1547

1548

1549

1550

1551

1552

1553

1554

1555

1556

1557

1558

1559

1560

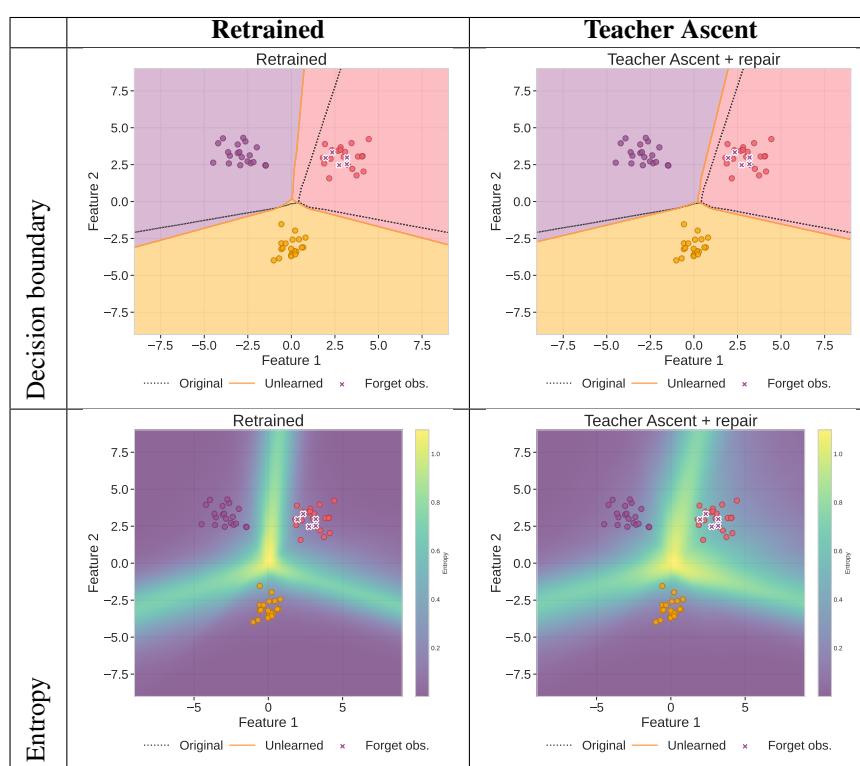
1561

1562

1563

1564

1565



1566

Table 19: Controlled setting results for unlearning scenario 4.

1567

1568

1569

1570

1571

1572

1573

1574

1575

1576

1577

1578

1579

1580

1581

1582

1583

1584

1585

1586

1587

1588

1589

1590

1591

1592

1593

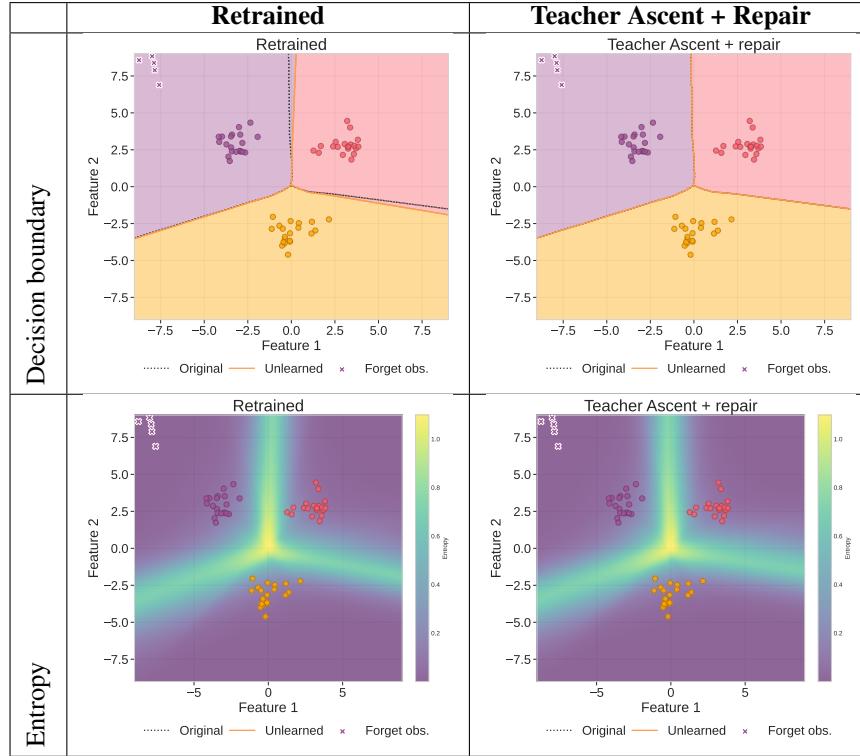


Table 20: Controlled setting results for unlearning scenario 5.

1594

1595

1596

1597

1598

1599

1600

1601

1602

1603

1604

1605

1606

1607

1608

1609

1610

1611

1612

1613

1614

1615

1616

1617

1618

1619

