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FEDERATED EQUILIBRIUM SOLUTIONS FOR GENERALIZED METHOD OF MOMENTS APPLIED TO INSTRUMENTAL VARIABLE ANALYSIS

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ABSTRACT

Instrumental variables (IV) analysis is an important applied tool for areas such as healthcare and consumer economics. For IV analysis in high-dimensional settings, the Generalized Method of Moments (GMM) using deep neural networks offer an efficient approach. With non-i.i.d. data sourced from scattered decentralized clients, federated learning is a popular paradigm for training the models while promising data privacy. However, to our knowledge, no federated algorithm for either GMM or IV analysis exists to date. In this work, we introduce federated IV analysis (FEDIV) via federated GMM (FEDGMM). We formulate FEDGMM as a federated zero-sum game defined by a non-convex non-concave minimax optimization problem. We characterize the solutions to the federated game using Stackelberg equilibrium and show that it satisfies client-local equilibria up to a heterogeneity bias. Thereby, we show that the consistency of federated GMM estimator across clients closely depends on the heterogeneity bias. Our experiments demonstrate that the federated framework for IV analysis efficiently recover the consistent GMM estimators for low and high-dimensional data.

1 INTRODUCTION

Federated Learning (FL) (McMahan et al., 2017) is now an established paradigm for training Machine Learning (ML) models over decentralized clients, keeping the data local and private. The applications include important domains such as healthcare (Oh & Nadkarni, 2023), finance & banking (Long et al., 2020), smart cities & mobility (Gecer & Garbinato, 2024), and many others (Ye et al., 2023). The scale of FL has also grown large – see the Nature Medicine report by Dayan et al. (2021) on a global-scale FL to predict the effectiveness of oxygen administration to COVID-19 patients in the emergency rooms while maintaining data locality. However, the current popular FL methods have a crucial limitation due to their standard supervised nature of learning. For example, Liang et al. (2023) suggests that the hypoxia-inducible factors (HIF) (a protein that controls the rate of transcription of genetic information from DNA to messenger RNA by binding to a specific DNA sequence) play a vital role in oxygen consumption at the cellular level. Arguably, the Dayan et al. (2021)’s approach may over- or under-estimate the effects of oxygen treatment as it does not accommodate the influence of HIF levels on oxygen consumption.

A classical approach to address such limitations is Instrumental variables (IV) analysis, which assumes conditional independence between a confounding variable and the outcome while considering its causal effect on the treatment variable. IV analysis can very practically apply to training Dayan et al. (2021)’s ML model wherein the patients’ HIF levels work as an IV that influences the effective organ-level oxygen consumption (a treatment variable) but does not directly affect the mortality of the COVID-19 patients (the outcome). IV analysis has been comprehensively explored in econometrics (Angrist & Krueger, 2001; Angrist & Pischke, 2009) with several decades of history, such as works of Wright (1928) and Reiersøl (1945). Its efficiency is now accepted for learning even high-dimensional complex causal relationships, such as those in image datasets (Hartford et al., 2017; Bennett et al., 2019). Naturally, the growing demand for FL entails designing methods for federated IV analysis, which, to our knowledge, is yet unexplored.

054 In the centralized deep learning setting, Hartford et al. (2017) introduced an IV analysis framework,
055 namely DEEPIV, which uses two stages of neural networks (NN) training – learn the conditional
056 treatment distribution as a NN-parametrized Gaussian mixture for the treatment prediction and
057 then train the outcome model. The two-stage process has precursors in applying the least square
058 regressions in the two phases (Angrist & Pischke, 2009)[4.1.1]. In the same setting, another approach
059 for IV analysis applies the generalized method of moments (GMM) (Wooldridge, 2001). GMM is
060 a celebrated estimation approach in social sciences and economics. It was introduced by Hansen
061 (1982), for which he won a Nobel Prize in Economics (Steif et al., 2014).

062 Lewis & Syrgkanis (2018) employed neural networks for GMM estimation. Their method, called
063 the adversarial generalized method of moments (AGMM) fit a GMM criterion function over a finite
064 set of unconditional moments. Similarly, Bennett et al. (2019) introduced deep learning models to
065 GMM estimation; they named their method DEEPGMM. DEEPGMM differs from AGMM in using
066 a weighted norm to define the objective function. The experiments in (Bennett et al., 2019) showed
067 that DEEPGMM outperformed AGMM for IV analysis, and both won against DEEPIV. Nonetheless,
068 to our knowledge, none of these methods has a federated counterpart. Notably, both AGMM and
069 DEEPGMM translate to a minimax optimization problem corresponding to a smooth zero-sum game.

070 The zero-sum game formulated for GMM estimation is essentially nonconvex-nonconcave (Bennett
071 et al., 2019). Such a game corresponds to a sequential game as it may have differing maximin and
072 minimax solutions. Unlike Nash equilibrium, the global minimax points – the Stackelberg equilibria –
073 are guaranteed to exist for nonconvex-nonconcave games. However, finding a global minimax point
074 is generally NP-hard, necessitating solving for a surrogate local equilibrium (Jin et al., 2020).

075 Now, considering the federated version of this problem, a fundamental challenge arises in establishing
076 that a federated minimax optimization algorithm retrieves a local Stackelberg equilibrium of the
077 federated zero-sum game. Even if it did, it requires showing that the federated equilibrium translates to
078 the client-local setting under heterogeneity. Finally, it entails proving that the client-local equilibrium
079 under heterogeneity is a consistent GMM estimator for its data. In this work, we address these
080 challenges. Our contributions are summarized as follows:

- 081 1. We introduce **FEDIV**: federated IV analysis. To our knowledge, **FEDIV** is the first work on IV
082 analysis in a federated setting.
- 083 2. We present **FEDDEEPGMM**¹ – a federated adaptation of DEEPGMM of Bennett et al. (2019) to
084 solve FEDIV. FEDDEEPGMM is implemented as a federated smooth zero-sum game.
- 085 3. We characterize an **approximate local equilibrium solution for federated zero-sum game**. We
086 show that the limit points of a federated gradient descent ascent (FEDGDA) algorithm include the
087 equilibria of the zero-sum game.
- 088 4. We show that an equilibrium solution of the federated game obtained at the server consistently
089 estimates the **moment conditions of every client**. An important insight derived from our results is
090 that the consistency of the GMM-estimators on clients directly depend on the heterogeneity bias.
- 091 5. We experimentally validate that even for non-i.i.d. data, FEDDEEPGMM has convergent dynamics
092 analogous to the centralized DEEPGMM algorithm.

093 This work focuses on the existence results of federated equilibrium solutions, federated consistent
094 GMM estimators, and thereby structurally solving the federated IV analysis problem. The existence
095 of approximate client-local equilibria via federated solution has applications beyond the GMM and
096 IV analysis, to problems such as federated generative adversarial networks (FedGAN) (Rasouli et al.,
097 2020), where a Nash Equilibrium may not exist (Farnia & Ozdaglar, 2020). However, the scope of
098 our discussion does not include FedGAN, or a new federated minimax algorithm, or, for that matter,
099 the convergence theory and scalability. We leave an open problem to characterize and recover a
100 federated mixed-strategy Nash equilibrium, which has enormous applications to diverse domains
(Barron, 2024). We compare and contrast our method against related works in Appendix D.

101
102

2 PRELIMINARIES AND MODEL

103
104 In this section, we introduce our basic terminologies tailored to a motivating application as described
105 by Dayan et al. (2021) in the context of the global-scale federated learning.

106
107 ¹Wu et al. (2023) used FEDGMM as an acronym for federated Gaussian mixture models.

108 **Client-local causal inference.** We begin by adapting (Bennett et al., 2019) for a client-local setting.
109 Consider a distributed system as a set of N clients $[N]$ with datasets $S^i = \{(x_j^i, y_j^i)\}_{j=1}^{n_i}, \forall i \in [N]$.
110 We assume that for a client $i \in [N]$, the treatment and outcome variables x_j^i and y_j^i , respectively, are
111 related by the process $Y^i = g_0^i(X^i) + \epsilon^i, i \in [N]$.

113 Referring to (Dayan et al., 2021), x_j^i and y_j^i represent the clinical features (CBC, D-dimer, oxy-
114 gen devices, etc.) and the outcome (death, duration of survival over oxygen administration, etc.),
115 respectively, on a client $i \in [N]$.

116 We assume that each client-local residual ϵ^i has zero mean and finite variance, i.e. $\mathbb{E}[\epsilon^i] = 0, \mathbb{E}[(\epsilon^i)^2] < \infty$. Furthermore, we assume that the treatment variables X^i are endogenous on
117 the clients, i.e. $\mathbb{E}[\epsilon^i | X^i] \neq 0$, and therefore, $g_0^i(X^i) \neq \mathbb{E}[Y^i | X^i]$. We assume that the treatment
118 variables are influenced by instrumental variables $Z^i, \forall i \in [N]$ so that

$$P(X^i | Z^i) \neq P(X^i). \quad (1)$$

120 Furthermore, the instrumental variables do not directly influence the outcome variables $Y^i, \forall i \in [N]$:

$$\mathbb{E}[\epsilon^i | Z^i] = 0. \quad (2)$$

123 Referring to (Dayan et al., 2021), Z^i would represent the HIF levels in the patients on the client
124 $i \in [N]$, which their implementation misses to incorporate.

127 **Federated causal inference function.** Note that, assumptions 1, 2 are local to the clients, thus,
128 honour the data-privacy requirements of a federated learning task. In this setting, we aim to discover
129 a common or global causal response function that would *fit the data generation processes of each*
130 *client without centralizing the data*. More specifically, we learn a parametric function $g_0(\cdot) \in G :=$
131 $\{g(\cdot, \theta) | \theta \in \Theta\}$ expressed as $g_0 := g(\cdot, \theta_0)$ for $\theta_0 \in \Theta$, defined by

$$g(\cdot, \theta_0) = \frac{1}{N} \sum_{i=1}^N g^i(\cdot, \theta_0). \quad (3)$$

136 **The generalized method of moments (GMM)** estimates the parameters of the causal response
137 function (3) using a certain number of *moment conditions*. Define the *moment function* on a client
138 $i \in [N]$ as a vector-valued function $f^i : \mathbb{R}^{|Z^i|} \rightarrow \mathbb{R}^m$ with components $f_1^i, f_2^i, \dots, f_m^i$. Based on
139 equation (2), we define the moment conditions using parametrized functions $\{f_j^i\}_{j=1}^m \forall i \in [N]$ as

$$\mathbb{E}[f_j^i(Z^i)\epsilon^i] = 0, \forall j \in [m], \forall i \in [N], \quad (4)$$

142 We assume that m moment conditions $\{f_j^i\}_{j=1}^m$ at each client $i \in [N]$ are sufficient to identify a
143 unique federated estimate $\hat{\theta}$ to θ_0 . With (4), we define the moment conditions on a client $i \in [N]$ as

$$\psi(f_j^i; \theta) = 0, \forall j \in [m], \quad (5)$$

146 where $\psi(f^i; \theta) := \mathbb{E}[f^i(Z^i)\epsilon^i] = \mathbb{E}[f^i(Z^i)(Y^i - g^i(X^i; \theta))]$. In empirical terms, the sample
147 moments for the i -th client with n_i samples are given by

$$\psi_{n_i}(f^i; \theta) := \mathbb{E}_{n_i}[f^i(Z^i)\epsilon^i] = \frac{1}{n_i} \sum_{k=1}^{n_i} f^i(Z_k^i)(Y_k^i - g^i(X_k^i; \theta)), \quad (6)$$

152 where $\psi_{n_i}(f^i; \theta) = (\psi_{n_i}(f_1^i; \theta), \psi_{n_i}(f_2^i; \theta), \dots, \psi_{n_i}(f_m^i; \theta))$ is the moment condition vector, and
153 $\psi_{n_i}(f_j^i; \theta) = \frac{1}{n_i} \sum_{k=1}^{n_i} f_j^i(Z_k^i)(Y_k^i - g^i(X_k^i; \theta))$. Thus, for empirical estimation of the causal
154 response function g_0^i at client $i \in [N]$, it needs to satisfy

$$\psi_{n_i}(f_j^i; \theta_0) = 0, \forall i \in [N] \text{ and } j \in [m] \text{ at } \theta = \theta_0. \quad (7)$$

157 **The optimization problem.** Equation (7) is reformulated as an optimization problem given by

$$\min_{\theta \in \Theta} \|\psi_{n_i}(f_1^i; \theta), \psi_{n_i}(f_2^i; \theta), \dots, \psi_{n_i}(f_m^i; \theta)\|^2, \quad (8)$$

161 where we use the Euclidean norm $\|w\|^2 = w^T w$. Drawing inspiration from Hansen (1982), DEEP-
GMM used a weighted norm, which yields minimal asymptotic variance for a consistent estimator

$\tilde{\theta}$, to cater to the cases of (finitely) large number of moment conditions. We adapt their weighted norm $\|w\|_{\tilde{\theta}}^2 = w^T \mathcal{C}_{\tilde{\theta}}^{-1} w$, to a client-local setting via the **positive semi-definite** covariance matrix $\mathcal{C}_{\tilde{\theta}}$ defined by

$$[\mathcal{C}_{\tilde{\theta}}]_{jl} = \frac{1}{n_i} \sum_{k=1}^{n_i} f_j^i(Z_k^i) f_l^i(Z_k^i) (Y_k^i - g^i(X_k^i; \tilde{\theta}))^2. \quad (9)$$

Now considering the vector space \mathcal{V} of real-valued functions f_i of Z , $\psi_{n_i}(f^i; \theta) = (\psi_{n_i}(f_1^i; \theta), \psi_{n_i}(f_2^i; \theta), \dots, \psi_{n_i}(f_m^i; \theta))$ is a linear operator on \mathcal{V} and

$$\mathcal{C}_{\tilde{\theta}}(f^i, h^i) = \frac{1}{n_i} \sum_{k=1}^{n_i} f^i(Z_k^i) h^i(Z_k^i) (Y_k^i - g^i(X_k^i; \tilde{\theta}))^2 \quad (10)$$

is a bilinear form. With that, for any subset $\mathcal{F}^i \subset \mathcal{V}$, we define a function

$$\Psi_{n_i}(\theta, \mathcal{F}^i, \tilde{\theta}) = \sup_{f^i \in \mathcal{F}^i} \psi_{n_i}(f^i; \theta) - \frac{1}{4} \mathcal{C}_{\tilde{\theta}}(f^i, f^i),$$

which leads to the following client-local optimization problem:

$$\theta^{\text{GMM}} \in \arg \min_{\theta \in \Theta} \Psi_{n_i}(\theta, \mathcal{F}^i, \tilde{\theta}), \quad (11)$$

where $\mathcal{F}^i = \text{span}(\{f_j^i\}_{j=1}^m)$, $\Psi_{n_i}(\theta, \mathcal{F}^i, \tilde{\theta}) = \|\psi_{n_i}(f_1^i; \theta), \psi_{n_i}(f_2^i; \theta), \dots, \psi_{n_i}(f_m^i; \theta)\|_{\tilde{\theta}}^2$, and the weighted norm $\|\cdot\|_{\tilde{\theta}}$ defined by equation (9).

The zero-sum game for deep generalized method of moments. As the data-dimension grows, the function class \mathcal{F}^i is replaced with a class of neural networks of a certain architecture, i.e. $\mathcal{F}^i = \{f^i(z, \tau) : \tau \in \mathcal{T}\}$ with varying weights τ . Similarly, let $\mathcal{G}^i = \{g^i(x, \theta) : \theta \in \Theta\}$ be another class of neural networks with varying weights θ . With that, define

$$U_{\tilde{\theta}}^i(\theta, \tau) := \frac{1}{n_i} \sum_{k=1}^{n_i} f^i(Z_k^i, \tau) (Y_k^i - g^i(X_k^i; \theta)) - \frac{1}{4n_i} \sum_{k=1}^{n_i} (f^i(Z_k^i, \tau))^2 (Y_k^i - g^i(X_k^i; \theta))^2 \quad (12)$$

Then for a client i , (11) is reformulated as the following

$$\theta^{\text{DGMM}} \in \arg \min_{\theta \in \Theta} \sup_{\tau \in \mathcal{T}} U_{\tilde{\theta}}^i(\theta, \tau). \quad (13)$$

Equation (13) forms a zero-sum game, whose equilibrium solution is shown to be a true estimator to θ_0 under a set of standard assumptions; see Theorem 2 in (Bennett et al., 2019).

3 FEDERATED DEEP GMM VIA FEDERATED EQUILIBRIUM SOLUTIONS

3.1 FEDERATED DEEP GENERALIZED METHOD MOMENT (FEDDEEPGMM)

We need to find the global moment estimators for the causal response function to fit data on each client. Thus, the federated counterpart of equation (5) is given by

$$\psi(f; \theta) := \mathbb{E}_i [\mathbb{E}[f^i(Z^i)(Y_k^i - g^i(X_k^i; \theta))] = 0, \quad (14)$$

where the expectation \mathbb{E}_i is over the clients. In this work, we consider *full client participation*. Thus, for the empirical federated moment estimation, we formulate:

$$\psi_n(f; \theta) := \frac{1}{N} \sum_{i=1}^N \psi_{n_i}(f^i; \theta) = \frac{1}{N} \sum_{i=1}^N \frac{1}{n_i} \sum_{k=1}^{n_i} f^i(Z_k^i) (Y_k^i - g^i(X_k^i; \theta)) \quad (15)$$

With that, the federated problem for GMM following (11) is formulated as:

$$\theta^{\text{FedDeepGMM}} \in \arg \min_{\theta \in \Theta} \|\psi_n(f; \theta)\|_{\tilde{\theta}}^2, \quad (16)$$

where $\|w\|_{\tilde{\theta}} = w^T \mathcal{C}_{\tilde{\theta}}^{-1} w$ is the previously defined weighted-norm with inverse covariance as weights. We propose FEDDEEPGMM, a “deep” reformulation of the federated optimization problem based on the neural networks of a given architecture shared among clients and is shown to have the same solution as the federated GMM problem formulated earlier.

216 **Lemma 1.** Let $\mathcal{F} = \text{span}\{f_j^i \mid i \in [N], j \in [m]\}$. An equivalent objective function for the federated
 217 moment estimation optimization problem (16) is given by:
 218

$$219 \quad \|\psi_N(f; \theta)\|_{\tilde{\theta}}^2 = \sup_{\substack{f^i \in \mathcal{F} \\ \forall i \in [N]}} \frac{1}{N} \sum_{i=1}^N \left(\psi_{n_i}(f^i; \theta) - \frac{1}{4} \mathcal{C}_{\tilde{\theta}}(f^i; f^i) \right), \text{ where} \\ 220 \\ 221 \\ 222 \quad \psi_{n_i}(f^i; \theta) := \frac{1}{n_i} \sum_{k=1}^{n_i} f^i(Z_k^i)(Y_k^i - g^i(X_k^i; \theta)), \text{ and } \mathcal{C}_{\tilde{\theta}}(f^i, f^i) := \frac{1}{n_i} \sum_{k=1}^{n_i} (f^i(Z_k^i))^2 (Y_k^i - g^i(X_k^i; \tilde{\theta}))^2. \\ 223 \\ 224$$

225 The proof of Lemma 1 is given in Appendix B.1. The federated zero-sum game is then defined by:
 226

$$227 \quad \hat{\theta}^{\text{FedDeepGMM}} \in \arg \min_{\theta \in \Theta} \sup_{\tau \in \mathcal{T}} U_{\tilde{\theta}}(\theta, \tau) := \frac{1}{N} \sum_{i=1}^N U_{\tilde{\theta}}^i(\theta, \tau), \quad (17) \\ 228$$

229 where $U_{\tilde{\theta}}^i(\theta, \tau)$ is defined in equation (12). The federated DEEPGMM formulation as a zero-sum
 230 game defined by a federated minimax optimization problem (17) provides a framework to recover the
 231 global estimator as a federated equilibrium solution.
 232

233 Referring to (Dayan et al., 2021), $\hat{\theta}^{\text{FedDeepGMM}}$ is the federated GMM estimator that consistently
 234 estimates the moment conditions of the clients under an approximation error as described later in
 235 Definition 3. These moment conditions are then employed on each client to analyse the impact of the
 236 instrumental variable Z^i .

237 3.2 FEDERATED SEQUENTIAL GAMES AND THEIR EQUILIBRIUM SOLUTIONS

239 As minimax is not equal to maximin in general for a non-convex-non-concave problem, it is important
 240 to model the federated game as a sequential game (Jin et al., 2020) whose outcome would depend on
 241 what move – maximization or minimization – is taken first. We start with the following assumptions:

242 **Assumption 1.** Client-local objective $U_{\tilde{\theta}}^i(\theta, \tau) \forall i \in [N]$ is twice continuously differentiable for both
 243 θ and τ . Thus, the global objective $U_{\tilde{\theta}}(\theta, \tau)$ is also a twice continuously differentiable function.
 244

245 **Assumption 2 (Smoothness).** The gradient of each client’s local objective, $\nabla U_{\tilde{\theta}}^i(\theta, \tau)$, is Lipschitz
 246 continuous with respect to both θ and τ . For all $i \in [N]$, there exist constants $L > 0$ such that:

$$247 \quad \|\nabla_{\theta} U_{\tilde{\theta}}^i(\theta_1, \tau_1) - \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_2, \tau_2)\| \leq L \|(\theta_1, \tau_1) - (\theta_2, \tau_2)\|, \text{ and}$$

$$248 \quad \|\nabla_{\tau} U_{\tilde{\theta}}^i(\theta_1, \tau_1) - \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_2, \tau_2)\| \leq L \|(\theta_1, \tau_1) - (\theta_2, \tau_2)\|,$$

249 $\forall (\theta_1, \tau_1), (\theta_2, \tau_2)$. Thus, $U_{\tilde{\theta}}(\theta, \tau)$ is L -Lipschitz smooth.
 250

251 **Assumption 3 (Bounded Gradient Dissimilarity).** The heterogeneity of the local gradients with
 252 respect to (w.r.t.) θ and τ is bounded as follows:

$$253 \quad \|\nabla_{\theta} U_{\tilde{\theta}}^i(\theta, \tau) - \nabla_{\theta} U_{\tilde{\theta}}(\theta, \tau)\| \leq \zeta_{\theta}^i \quad \|\nabla_{\tau} U_{\tilde{\theta}}^i(\theta, \tau) - \nabla_{\tau} U_{\tilde{\theta}}(\theta, \tau)\| \leq \zeta_{\tau}^i,$$

254 where $\zeta_{\theta}^i, \zeta_{\tau}^i \geq 0$ are the bounds that quantify the degree of gradient dissimilarity at client $i \in [N]$.
 255

256 **Assumption 4 (Bounded Hessian Dissimilarity).** The heterogeneity in terms of hessian w.r.t. θ and
 257 τ is bounded as follows:
 258

$$258 \quad \|\nabla_{\theta\theta}^2 U_{\tilde{\theta}}^i(\theta, \tau) - \nabla_{\theta\theta}^2 U_{\tilde{\theta}}(\theta, \tau)\|_{\sigma} \leq \rho_{\theta}^i, \quad \|\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\theta, \tau) - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau)\|_{\sigma} \leq \rho_{\tau}^i,$$

$$259 \quad \|\nabla_{\theta\tau}^2 U_{\tilde{\theta}}^i(\theta, \tau) - \nabla_{\theta\tau}^2 U_{\tilde{\theta}}(\theta, \tau)\|_{\sigma} \leq \rho_{\theta\tau}^i, \quad \|\nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i(\theta, \tau) - \nabla_{\tau\theta}^2 U_{\tilde{\theta}}(\theta, \tau)\|_{\sigma} \leq \rho_{\tau\theta}^i,$$

260 where $\rho_{\theta}^i, \rho_{\tau}^i, \rho_{\theta\tau}^i$, and $\rho_{\tau\theta}^i \geq 0$ quantify the degree of hessian dissimilarity at client $i \in [N]$ by
 261 spectral norm $\|\cdot\|_{\sigma}$.
 262

263 Assumptions 3 and 4 provide a measure of data heterogeneity across clients in a federated setting. In
 264 the special case, when ζ and ρ ’s are all 0, then the data is homogeneous across clients.
 265

266 We adopt the Stackelberg equilibrium for pure strategies (Jin et al., 2020) to characterize the solution
 267 of the minimax federated optimization problem for a non-convex non-concave function $U_{\tilde{\theta}}(\theta, \tau)$ for
 268 the sequential game where min-player goes first and the max-player goes second. *To avoid ambiguity
 269 between the adjectives of the terms global/local objective functions in federated learning and the
 global/local nature of minimax points in optimization, we refer to a global objective as the federated
 objective and a local objective as the client’s objective.*

270 **Definition 1 (Local minimax point).** [Definition 14 of (Jin et al., 2020)] Let $U(\theta, \tau)$ be a function
 271 defined over $\Theta \times \mathcal{T}$ and let h be a function satisfying $h(\delta) \rightarrow 0$ as $\delta \rightarrow 0$. There exists a δ_0 , such
 272 that for any $\delta \in (0, \delta_0]$, and any (θ, τ) such that $\|\theta - \hat{\theta}\| \leq \delta$ and $\|\tau - \hat{\tau}\| \leq \delta$, then a point $(\hat{\theta}, \hat{\tau})$ is
 273 a local minimax point of U , if $\forall (\theta, \tau) \in \Theta \times \mathcal{T}$, it satisfies:

$$U_{\tilde{\theta}}(\hat{\theta}, \tau) \leq U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \leq \max_{\tau': \|\tau' - \hat{\tau}\| \leq h(\delta)} U_{\tilde{\theta}}(\theta, \tau'). \quad (18)$$

277 With that, the first-order & second-order necessary conditions for local minimax points are as below.

278 **Lemma 2** (Propositions 18, 19, 20 of (Jin et al., 2020)). Under assumption 1, any local minimax
 279 point satisfies the following conditions:

- 280 • **First-order Necessary Condition:** A local minimax point (θ, τ) satisfies: $\nabla_{\theta} U_{\tilde{\theta}}(\theta, \tau) = 0$ and
 281 $\nabla_{\tau} U_{\tilde{\theta}}(\theta, \tau) = 0$.
- 282 • **Second-order Necessary Condition:** A local minimax point (θ, τ) satisfies: $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau) \preceq \mathbf{0}$.
 283 Moreover, if $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau) \prec 0$, then $\left[\nabla_{\theta\theta}^2 U_{\tilde{\theta}} - \nabla_{\theta\tau}^2 U_{\tilde{\theta}} (\nabla_{\tau\tau}^2 U_{\tilde{\theta}})^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}} \right] (\theta, \tau) \succeq 0$.
- 284 • **Second-order Sufficient Condition:** A stationary point (θ, τ) that satisfies $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau) \prec \mathbf{0}$, and
 285 $\left[\nabla_{\theta\theta}^2 U_{\tilde{\theta}} - \nabla_{\theta\tau}^2 U_{\tilde{\theta}} (\nabla_{\tau\tau}^2 U_{\tilde{\theta}})^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}} \right] (\theta, \tau) \succ 0$ guarantees that (θ, τ) is a strict local minimax.

288 Now, in order to define the federated approximate equilibrium solutions, we first define an approximate
 289 local minimax point.

290 **Definition 2 (Approximate Local minimax point).** [An adaptation of definition 34 of (Jin et al.,
 291 2020)] Let $U(\theta, \tau)$ be a function defined over $\Theta \times \mathcal{T}$ and let h be a function satisfying $h(\delta) \rightarrow 0$ as
 292 $\delta \rightarrow 0$. There exists a δ_0 , such that for any $\delta \in (0, \delta_0]$, and any (θ, τ) such that $\|\theta - \hat{\theta}\| \leq \delta$ and
 293 $\|\tau - \hat{\tau}\| \leq \delta$, then a point $(\hat{\theta}, \hat{\tau})$ is an ε -approximate local minimax point of U , if it satisfies:

$$U_{\tilde{\theta}}(\hat{\theta}, \tau) - \varepsilon \leq U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \leq \max_{\tau': \|\tau' - \hat{\tau}\| \leq h(\delta)} U_{\tilde{\theta}}(\theta, \tau') + \varepsilon, \quad (19)$$

297 We aim to achieve approximate local minimax points for every client as a solution of the federated
 298 minimax optimization. With that, we characterize the federated solution as the following.

299 **Definition 3 (ε -Approximate Federated Equilibrium Solutions).** Let $\mathcal{E} = \{\varepsilon^i\}_{i=1}^N$ be the ap-
 300 proximation error vector for clients $i \in [N]$. Let $U_{\tilde{\theta}}^i(\theta, \tau)$ be a function defined over $\Theta \times \mathcal{T}$ for a
 301 client $i \in [N]$ and $U_{\tilde{\theta}}(\theta, \tau) := \frac{1}{N} \sum_{i=1}^N U_{\tilde{\theta}}^i(\theta, \tau)$. An \mathcal{E} -approximate federated equilibrium point
 302 $(\hat{\theta}, \hat{\tau})$ (that is an ε^i -approximate local minimax point for each client's objective $U_{\tilde{\theta}}^i$), must follow the
 303 conditions below:

- 305 1. **ε^i -First-order Necessary Condition:** The point $(\hat{\theta}, \hat{\tau})$ must be an ε^i stationary point for every
 306 client $i \in [N]$, i.e., $\|\nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau})\| \leq \varepsilon^i$, and $\|\nabla_{\tau} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau})\| \leq \varepsilon^i$.
- 307 2. **Second-Order ε^i Necessary Condition:** The point $(\hat{\theta}, \hat{\tau})$ must satisfy the second-order conditions:
 308 $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \preceq -\varepsilon^i I$, and $\left[\nabla_{\theta\theta}^2 U_{\tilde{\theta}}^i - \nabla_{\theta\tau}^2 U_{\tilde{\theta}}^i (\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i \right] (\hat{\theta}, \hat{\tau}) \succeq \varepsilon^i I$.
- 310 3. **Second-Order ε^i Sufficient Condition:** An ε^i stationary point (θ, τ) that satisfies $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \prec$
 311 $-\varepsilon^i I$, and $\left[\nabla_{\theta\theta}^2 U_{\tilde{\theta}}^i - \nabla_{\theta\tau}^2 U_{\tilde{\theta}}^i (\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i \right] (\hat{\theta}, \hat{\tau}) \succ \varepsilon^i I$ guarantees that $(\hat{\theta}, \hat{\tau})$ is a strict
 312 local minimax point $\forall i \in [N]$ that satisfies ε^i approximate equilibrium as in definition 2.

314 We now state the main theoretical result of our work in this theorem.

315 **Theorem 1.** Under assumptions 1, 2, 3 and 4, a minimax solution $(\hat{\theta}, \hat{\tau})$ of federated opti-
 316 mization problem (17) that satisfies the equilibrium condition as in definition 1: $U_{\tilde{\theta}}(\hat{\theta}, \tau) \leq$
 317 $U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \leq \max_{\tau': \|\tau' - \hat{\tau}\| \leq h(\delta)} U_{\tilde{\theta}}(\theta, \tau')$, is an \mathcal{E} -approximate federated equilibrium solution as
 318 defined in 3, where the approximation error ε^i for each client $i \in [N]$ lies in: $\max\{\zeta_{\theta}^i, \zeta_{\tau}^i\} \leq$
 319 $\varepsilon^i \leq \min\{\alpha - \rho_{\tau}^i, \beta - B^i\}$ for $\rho_{\tau}^i < \alpha$ and $B^i > \beta$, such that $\alpha := \left| \lambda_{\max} \left(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \right) \right|$,
 320 $\beta := \lambda_{\min} \left(\left[\nabla_{\theta\theta}^2 U_{\tilde{\theta}} - \nabla_{\theta\tau}^2 U_{\tilde{\theta}} (\nabla_{\tau\tau}^2 U_{\tilde{\theta}})^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}} \right] (\hat{\theta}, \hat{\tau}) \right)$ and $B^i := \rho_{\theta}^i + L \rho_{\theta\tau}^i \frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)|} +$
 321 $L \rho_{\tau\theta}^i \frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)|} + L^2 \rho_{\tau}^i \frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i) \cdot \lambda_{\max}(\nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i)|}$.

The proof of Theorem 1 is given in Appendix B.2. Note that when data is homogeneous (i.e., for each client i , $\zeta_\theta^i, \zeta_\tau^i, \rho_\tau^i$ and B^i are all zeroes), each client satisfies an exact local minimax equilibrium.

Remark 1. In Theorem 1, note that if the interval $[\max\{\zeta_\theta^i, \zeta_\tau^i\}, \min\{\alpha - \rho_\tau^i, \beta - B^i\}]$ is empty, i.e. $\max\{\zeta_\theta^i, \zeta_\tau^i\} > \min\{\alpha - \rho_\tau^i, \beta - B^i\}$, then no such ε^i exists and $(\hat{\theta}, \hat{\tau})$ fails to be a local ε^i approximate equilibrium point for that clients. It may happen in two cases:

1. The gradient dissimilarity $\zeta_\theta^i, \zeta_\tau^i$ is too large, indicating high heterogeneity, then $(\hat{\theta}, \hat{\tau})$ - the solution to the federated objective would fail to become an approximate equilibrium point for the clients. It is a practical consideration for a federated convergence facing difficulty against high heterogeneity.
2. If $\alpha \approx \rho_\tau^i$ or $\beta \approx B^i$, this indicates that the client's local curvature structure significantly differs from the global curvature. In this case, the client's objective may be flatter or even oppositely curved compared to the global model, reflecting high heterogeneity.

Now we state the result on the per-client consistency of the FEDGMM estimator.

Theorem 2 (Consistency). [Adaptation of Theorem 2 of (Bennett et al., 2019)] Let $\tilde{\theta}_n$ be a data-dependent choice for the federated objective that has a limit in probability. Let h be a function satisfying $h(\delta) \rightarrow 0$ as $\delta \rightarrow 0$. For each client $i \in [N]$, define $m^i(\theta, \tau, \tilde{\theta}) := f^i(Z^i; \tau)(Y^i - g(X^i; \theta)) - \frac{1}{4}f^i(Z^i; \tau)^2(Y^i - g(X^i; \theta))^2$, $M^i(\theta) = \sup_{\tau \in \mathcal{T}} \mathbb{E}[m^i(\theta, \tau, \tilde{\theta})]$ and $\eta^i(\epsilon) := \inf_{d(\theta, \theta_0) \geq \epsilon} M^i(\theta) - M^i(\theta_0)$ for every $\epsilon > 0$. Fix some δ_0 , for any $\delta \in (0, \delta_0]$ and any (θ, τ) such that $\|\theta - \tilde{\theta}\| \leq \delta$ and $\|\tau - \hat{\tau}\| \leq \delta$, let $(\hat{\theta}_n, \hat{\tau}_n)$ be a solution that satisfies the approximate equilibrium for each of the client $i \in [N]$ as

$$\sup_{\tau \in \mathcal{T}} U_\theta^i(\hat{\theta}_n, \tau) - \varepsilon^i - o_p(1) \leq U_\theta^i(\hat{\theta}_n, \hat{\tau}_n) \leq \inf_{\theta \in \Theta} \max_{\tau: \|\tau - \hat{\tau}_n\| \leq h(\delta)} U_\theta^i(\theta, \tau) + \varepsilon^i + o_p(1).$$

Then, under similar assumptions as in Assumptions 1 to 5 of (Bennett et al., 2019), the global solution $\hat{\theta}_n$ is a consistent estimator to the true parameter θ_0 , i.e. $\hat{\theta}_n \xrightarrow{p} \theta_0$ when the approximate error $\varepsilon^i < \frac{\eta^i(\epsilon)}{2}$ for every $\epsilon > 0$ for each client $i \in [N]$.

The assumptions and the proof of Theorem 2 are included in Appendix B.3.

Remark 2. Theorem 2 formalizes a tradeoff between data heterogeneity and the consistency of the global estimator in federated learning for each client. If the approximation error ε^i is large for a client $i \in [N]$, then the solution $\hat{\theta}_n$ may fail to consistently estimate the true parameter of client i . In contrast, when data across clients have similar distribution (i.e., case for low heterogeneity), the federated optimal model $\hat{\theta}_n$ is consistent across clients.

3.3 FEDERATED GRADIENT DESCENT ASCENT ALGORITHM AND IT'S LIMIT POINTS

Bennett et al. (2019) used Optimistic Adam (OADAM), a variant of Adam (Kingma, 2015) based stochastic gradient descent ascent (SGDA) algorithm (Daskalakis et al., 2018). However, it is known that a well-tuned SGD outperforms Adam in overparametrized settings (Wilson et al., 2017). As our experiments show in Section (4), that gradient descent ascent updates are competitive to OADAM for minimax optimization in centralized setting. Considering this, we employ an adaptation of the standard gradient descent ascent algorithm to federated (FEDGDA) setting.

FEDGDA is well-explored in the literature: (Deng & Mahdavi, 2021; Sharma et al., 2022; Shen et al., 2024; Wu et al., 2024). The clients run the gradient descent ascent algorithm for several local updates and then the orchestrating server synchronizes them by collecting the model states, averaging them, and broadcasting it to the clients. A detailed description is included as a pseudocode in Appendix A.

Similar to (Bennett et al., 2019), we note that the federated minimax optimization problem (17) is not convex-concave on (θ, τ) . The convergence results of variants of FEDGDA (Sharma et al., 2022; Shen et al., 2024; Wu et al., 2024) assume that $U_{\tilde{\theta}}(\theta, \tau)$ is non-convex on θ and satisfies a μ -Polyak Łojasiewicz (PL) inequality on τ , see assumption 4 in (Sharma et al., 2022). PL condition is known to be satisfied by over-parametrized neural networks (Charles & Papailiopoulos, 2018; Liu et al., 2022). The convergence results of FEDGDA will follow (Sharma et al., 2022). We include a formal statement in Appendix A. However, beyond convergence, we primarily aim to show that an optimal solution will consistently estimate the moment conditions of the clients, which we do next.

For Algorithm 1 in Appendix A, let $\alpha_1 = \frac{\eta}{\gamma}, \alpha_2 = \eta$ be the learning rates for gradient updates to θ and τ , respectively. Without loss of generality the FEDGDA updates are:

$$\theta_{t+1} = \theta_t - \eta \frac{1}{\gamma} \frac{1}{N} \sum_{i \in [N]} \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \text{ and } \tau_{t+1} = \tau_t + \eta \frac{1}{N} \sum_{i \in [N]} \sum_{r=1}^R \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i)$$

We call it γ -FEDGDA, where γ is the ratio of α_1 to α_2 . As $\eta \rightarrow 0$ corresponds to FEDGDA-flow, under the smoothness of $U_{\tilde{\theta}}^i$, bounded gradient heterogeneity (assumption 3) and for fixed local rounds R , FEDGDA-flow becomes:

$$\frac{d\theta}{dt} = -\frac{1}{\gamma} R \nabla_{\theta} U_{\tilde{\theta}}(\theta, \tau) + \mathcal{O}\left(\frac{R}{\gamma} \zeta_{\theta}\right), \text{ and } \frac{d\tau}{dt} = R \nabla_{\tau} U_{\tilde{\theta}}(\theta, \tau) + \mathcal{O}(R \zeta_{\tau}).$$

We further elaborate on FEDGDA-flow in Appendix C.1. We aim to find out the relationship between stable equilibrium and local minimax points of the federated optimization problem. For that, we now define a strictly linearly stable equilibrium of the γ -FEDGDA flow.

Proposition 1. *Given the Jacobian matrix for γ -FEDGDA flow as $\mathbf{J} = \begin{pmatrix} -\frac{1}{\gamma} R \nabla_{\theta\theta}^2 U_{\tilde{\theta}}(\theta, \tau) & -\frac{1}{\gamma} R \nabla_{\theta\tau}^2 U_{\tilde{\theta}}(\theta, \tau) \\ R \nabla_{\tau\theta}^2 U_{\tilde{\theta}}(\theta, \tau) & R \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau) \end{pmatrix}$, a point (θ, τ) is a strictly linearly stable equilibrium of the γ -FEDGDA flow if and only if the real parts of all eigenvalues of \mathbf{J} are negative, i.e., $\text{Re}(\Lambda_j) < 0$ for all j .*

The proof follows a strategy similar to (Jin et al., 2020).

Let $\gamma\text{-FGDA}$ be the set of strictly linearly stable points of the γ -FEDGDA flow, and LocMinimax be the set of local minimax points of the federated zero-sum game. Define

$$\begin{aligned} \overline{\infty - \text{FGDA}} &:= \limsup_{\gamma \rightarrow \infty} \gamma - \text{FGDA} := \cap_{\gamma_0 > 0} \cup_{\gamma > \gamma_0} \gamma - \text{FGDA}, \text{ and} \\ \underline{\infty - \text{FGDA}} &:= \liminf_{\gamma \rightarrow \infty} \gamma - \text{FGDA} := \cup_{\gamma_0 > 0} \cap_{\gamma > \gamma_0} \gamma - \text{FGDA}. \end{aligned}$$

We now state the theorem that establishes that the stable limit points of $\infty\text{-FGDA}$ are the local minimax points, up to some degenerate cases.

Theorem 3. *Under Assumption 1, $\text{LocMinimax} \subset \overline{\infty - \text{FGDA}} \subset \underline{\infty - \text{FGDA}} \subset \text{LocMinimax} \cup \mathcal{A}$, where $\mathcal{A} := \{(\theta, \tau) | (\theta, \tau) \text{ is stationary and } \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau) \text{ is degenerate}\}$. Moreover, if the hessian $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau)$ is smooth, then \mathcal{A} has measure zero in $\Theta \times \mathcal{T} \subset \mathbb{R}^d \times \mathbb{R}^k$.*

Essentially, Theorem 3 states that the limit points of FEDGDA are the local minimax solutions, and thereby the equilibrium solution of the federated zero-sum game, up to some degenerate case. The proof of Theorem 3 is included in Appendix C.2. Theorems 1, 2, and 3 together complete the theoretical foundation of the pipeline in our work.

4 EXPERIMENTS

We extend the experimental evaluations of DEEPGMM (Bennett et al., 2019) to a federated setting. We further discuss this benchmark structure in Appendix E. More specifically, we evaluate the ability of FEDDEEPGMM to fit low- and high- dimensional data to demonstrate its convergence. Similar to DEEPGMM, we assess two scenarios in regards to $((X, Y), Z)$:

(a) **The instrumental and treatment variables Z and X are both low-dimensional.** In this case, we use 1-dimensional synthetic datasets corresponding to the following functions: (a) **Absolute**: $g_0(x) = |x|$, (b) **Step**: $g_0(x) = 1_{\{x \geq 0\}}$, (c) **Linear**: $g_0(x) = x$. To generate the synthetic data, similar to (Bennett et al., 2019; Lewis & Syrgkanis, 2018) we apply the following generation process:

$$Y = g_0(X) + e + \delta \quad \text{and } X = Z^{(1)} + Z^{(2)} + e + \gamma \quad (20)$$

$$(Z^{(1)}, Z^{(2)}) \sim \text{Uniform}([-3, 3]^2) \quad \text{and } e \sim \mathcal{N}(0, 1), \quad \gamma, \delta \sim \mathcal{N}(0, 0.1) \quad (21)$$

- (b) **Z and X are low-dimensional or high-dimensional or both.** First, Z and X are generated as in (20,21). Then for high-dimensional data, we map Z and X to an image using the mapping:

$$\text{Image}(x) = \text{Dataset}(\text{round}(\min(\max(1.5x + 5, 0), 9))),$$

where $\text{round}(\min(\max(1.5x + 5, 0), 9))$ returns an integer between 0 and 9. Essentially, the function `Dataset(.)` randomly selects an image following its index. We use datasets FEMNIST (Federated Extended MNIST) and CIFAR10 (Caldas et al., 2018) for images of size 28×28 and $3 \times 32 \times 32$, respectively. Thus, we have the following cases: (a) **Dataset_z**: $X = X^{\text{low}}$, $Z = \text{Image}(Z^{\text{low}})$, (b) **Dataset_x**: $Z = Z^{\text{low}}$, $X = \text{Image}(X^{\text{low}})$, and (c) **Dataset_{x,z}**: $Z = \text{Image}(Z^{\text{low}})$, $X = \text{Image}(X^{\text{low}})$, where **Dataset** takes values **FEMNIST** and **CIFAR10**.

We implemented and benchmarked FEDGDA and FEDSGDA to solve the FEDDEEPGMM problem. For reference, we implemented OADAM, GDA, and SGDA to solve the DEEPGMM in centralized setting. For high-dimensional scenarios, we implement a CNN architecture to process images, while for low-dimensional scenarios, we use a multilayer perceptron (MLP). Code is available at <https://anonymous.4open.science/r/FederatedDeepGMM-417C>.

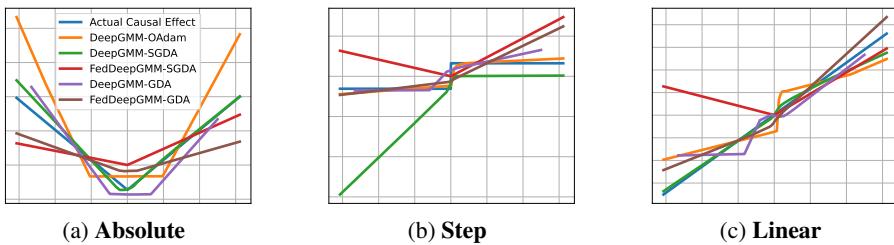


Figure 1: Estimated \hat{g} compared to true g in low-dimensional scenarios

Estimations	DEEPGMM-OAdam	DEEPGMM-GDA	FDEEPGMM-GDA	DEEPGMM-SGDA	FDEEPGMM-SGDA
Absolute	0.03 ± 0.01	$0.013 \pm .01$	0.4 ± 0.01	0.009 ± 0.01	0.2 ± 0.00
Step	0.3 ± 0.00	0.03 ± 0.00	0.04 ± 0.01	0.112 ± 0.00	0.23 ± 0.01
Linear	0.01 ± 0.00	0.02 ± 0.00	0.01 ± 0.00	0.03 ± 0.00	0.04 ± 0.00
FEMNIST_x	0.50 ± 0.00	1.11 ± 0.01	0.21 ± 0.02	0.40 ± 0.01	0.19 ± 0.01
FEMNIST_{x,z}	0.24 ± 0.00	0.46 ± 0.09	0.19 ± 0.03	0.14 ± 0.02	0.20 ± 0.00
FEMNIST_z	0.10 ± 0.00	0.42 ± 0.01	0.24 ± 0.01	0.11 ± 0.02	0.23 ± 0.01
CIFAR10_x	0.55 ± 0.30	0.19 ± 0.01	0.25 ± 0.03	0.20 ± 0.08	0.22 ± 0.08
CIFAR10_{x,z}	0.40 ± 0.11	0.24 ± 0.00	0.24 ± 0.03	0.19 ± 0.03	0.22 ± 0.02
CIFAR10_z	0.13 ± 0.03	0.13 ± 0.01	1.70 ± 2.60	0.24 ± 0.01	0.52 ± 0.60

Table 1: The averaged Test MSE with standard deviation on the low- and high-dimensional scenarios.

Non-i.i.d. data. To set up a non-i.i.d. distribution of data between clients, samples were divided amongst the clients using a Dirichlet distribution $Dir_S(\alpha)$ (Hsu et al., 2019), where α determines the degree of heterogeneity across S clients. We used $Dir_S(\alpha) = 0.3$ for each train, test, and validation samples. Given the non-i.i.d. data, for the low-dimensional scenario, we sample $n = 20000$ points for each train, validation, and test set, while, for the high-dimensional scenario, we have $n = 20000$ for the train set and $n = 10000$ for the validation and test set.

Hyperparameters. We perform extensive grid-search to tune the learning rate. For FEDSGDA, we use a minibatch-size of 256. To avoid numerical instability, we standardize the observed Y values by removing the mean and scaling to unit variance. We perform five runs of each experiment and present the mean and standard deviation of the results.

Observations and Discussion. In figure (1), we first observe that SGDA and GDA algorithms perform at par with OADAM to fit the DEEPGMM estimator. It establishes that hyperparameter tuning is effective. With that, we further observe that the federated algorithms efficiently fit the estimated function to the true data-generating process even though the data is decentralized and non-i.i.d. Thus, it shows that the federated algorithm converges effectively. In Table 1 we present the test mean squared error (MSE) values. In many cases, the federated MSE values are close or better than the centralized results, which sufficiently demonstrate that our federated implementation achieves a convergent dynamics. We include additional experimental results in Appendix E that investigate the effects of heterogeneity. These experiments establish the efficacy of our method.

486 EXISTENCE OF FEDERATED MIXED-STRATEGY EQUILIBRIUM AND ITS
487 IMPLICATIONS
488

489 In this work, we presented the equilibrium solutions of federated zero-sum games through federated
490 local minimax solutions for non-convex non-concave minimax optimization problems. The translation
491 of the federated equilibrium as an approximately consistent GMM estimator for the clients was
492 obtained through the gradient and Hessian dissimilarities across the clients, see Theorem 1, Theorem 2,
493 and Definition 3. We note that our minimax optimization solution provides a federated pure strategy
494 equilibrium. However, a pure strategy equilibrium can correspond to only full gradients and a full
495 client participation setting. To elaborate,

- 496
- 497 • Firstly, with stochastic gradients on the clients, there will be no guarantee of descent (corre-
498 spondingly, ascent) at an optimization step, which is available only in expectation in this
499 case. However, in a pure strategy zero-sum game, the minimizing player (correspondingly,
500 the maximizing player) takes a step to minimize (correspondingly, maximize) the game
501 objective at each step.
 - 502 • Secondly, the path to the saddle-point of a player in a pure strategy game should be re-
503 traceable/deterministic, which can not be possible with minimax optimization with stochastic
504 gradients and/or partial client participation, considering the true random sampling.

505 Allowing for stochasticity, whether arising from stochastic gradients or client sampling for each com-
506 munication round, would necessitate accommodating a distribution over multiple actions. Whereby
507 the game ceases to be a pure strategy game, as the actions become non-deterministic, essentially,
508 resulting in a mixed-strategy zero-sum game. It is well understood that, regardless of the analytical
509 assumptions regarding the objective, mixed strategy solutions for zero-sum games exist (Jin et al.,
510 2020).

511 However, for federated mixed strategy solutions, recovering a GMM estimator for a client is not
512 immediate. To elaborate, there are no analogous necessary and sufficient conditions – the first-order
513 and second-order necessary and sufficient conditions that we have for federated pure strategy solutions
514 in Lemma 2 – for the mixed strategy solutions, which would correspond to a distribution over a set of
515 the global model states synchronized across clients. Therefore, we can not directly apply Theorem 1.
516 Still, we note here that a federated mixed strategy equilibrium will provide a robust federated GMM
517 estimator compared to pure-strategy solutions, as it will output a probability distribution over a set of
518 model states that accounts for the uncertainty across clients.

519 We leave the algorithm and characterization of a federated mixed strategy equilibrium solution for a
520 robust federated GMM estimator as an open problem.

521

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APPENDIX

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756 A FEDERATED GRADIENT DESCENT ASCENT ALGORITHM DESCRIPTION

759 **Algorithm 1** FEDGDA running on a federated learning server to solve the minimax problem (17)

760 **Server Input:** initial global estimate θ_1, τ_1 ; constant local learning rate α_1, α_2 ; total N clients

761 **Output:** global model states θ_{T+1}, τ_{T+1}

```

762 1: for synchronization round  $t = 1, \dots, T$  do
763 2:   server sends  $\theta_t, \tau_t$  to all clients
764 3:   for each  $i \in [N]$  in parallel do
765 4:      $\theta_{t,1}^i \leftarrow \theta_t, \tau_{t,1}^i \leftarrow \tau_t$ 
766 5:     for  $r = 1, 2, \dots, R$  do
767 6:        $\theta_{t,r+1}^i = \theta_{t,r}^i - \alpha_1 \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i)$ 
768 7:        $\tau_{t,r+1}^i = \tau_{t,r}^i + \alpha_2 \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i)$ 
769 8:     end for
770 9:      $(\Delta\theta_t^i, \Delta\tau_t) \leftarrow (\theta_{t,R+1}^i - \theta_t, \tau_{t,R+1}^i - \tau_t)$ 
771 10:   end for
772 11:    $(\Delta\theta_t, \Delta\tau_t) \leftarrow \frac{1}{N} \sum_{i \in [N]} (\Delta\theta_t^i, \Delta\tau_t^i)$ 
773 12:    $\theta_{t+1} \leftarrow (\theta_t + \Delta\theta_t), \tau_{t+1} \leftarrow (\tau_t + \Delta\tau_t)$ 
774 13: end for
775 14: return  $\theta_{T+1}; \tau_{T+1}$ 

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777 A.1 CONVERGENCE OF FEDGDA

779 We adapt the proof of Theorem 1 in (Sharma et al., 2022) for the SGDA algorithm proposed in (Deng
780 & Mahdavi, 2021) for the FEDGDA algorithm 1 for smooth non-convex- PL problems.

781 **Assumption 5** (Polyak Łojasiewicz (PL) condition in τ). The function $U_{\tilde{\theta}}$ satisfies $\mu - PL$
782 condition in τ , $\mu > 0$, if for any fixed θ , $\arg \max_{\tau'} U_{\tilde{\theta}}(\theta, \tau') \neq \phi$ and $\|\nabla_{\tau} U_{\tilde{\theta}}(\theta, \tau)\|^2 \geq 2\mu (\max_{\tau'} U_{\tilde{\theta}}(\theta, \tau') - U_{\tilde{\theta}}(\theta, \tau))$.

785 We use the following result about the smoothness of $\Phi(\cdot)$.

787 **Lemma 3.** (Nouiehed et al., 2019) If the function $U_{\tilde{\theta}}(\theta, \cdot)$ satisfies Assumptions 2, 5 (L-smoothness
788 and μ -PL condition in τ), then $\Phi(\theta)$ is L_{Φ} -smooth with $L_{\Phi} = \kappa L/2 + L$, where $\kappa = L/\mu$ is the
789 condition number.

790 **Lemma 4** (One-Step Envelope Descent). (Deng & Mahdavi, 2021) Suppose the local client loss
791 functions $\{U_{\tilde{\theta}}^i(\theta, \tau)\}$ satisfy Assumptions 2, 5. Then the iterates generated by FEDGDA satisfy:

$$\begin{aligned}
793 \Phi(\theta_{t+1}) &\leq \Phi(\theta_t) - \frac{\alpha_1}{2} \|\nabla \Phi(\theta_t)\|^2 - \frac{\alpha_1}{2} (1 - L_{\Phi} \alpha_1) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
794 &\quad + \frac{2\alpha_1 L^2}{\mu} (\Phi(\theta_t) - U_{\tilde{\theta}}(\theta_t, \tau_t)) + 2\alpha_1 L^2 R \Delta_t^{\theta, \tau}
\end{aligned}$$

798 where the synchronization error is defined as:

$$\Delta_t^{\theta, \tau} := \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R (\|\theta_{t,r}^i - \theta_t\|^2 + \|\tau_{t,r}^i - \tau_t\|^2).$$

803 *Proof.* Using Lemma 3, $\Phi(\cdot)$ is $L_{\Phi} = \kappa L/2 + L$ -smooth, and together with the updating rule, we
804 have:

$$\begin{aligned}
806 \Phi(\theta_{t+1}) &\leq \Phi(\theta_t) + \langle \nabla \Phi(\theta_t), \theta_{t+1} - \theta_t \rangle + \frac{L_{\Phi}}{2} \|\theta_{t+1} - \theta_t\|^2 \\
807 &\leq \Phi(\theta_t) - \alpha_1 \left\langle \nabla \Phi(\theta_t), \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\rangle + \frac{L_{\Phi}}{2} \alpha_1^2 \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2
\end{aligned}$$

810 Using the identity $\langle \mathbf{a}, \mathbf{b} \rangle = -\frac{1}{2}\|\mathbf{a} - \mathbf{b}\|^2 + \frac{1}{2}\|\mathbf{a}\|^2 + \frac{1}{2}\|\mathbf{b}\|^2$, we have:

811

$$\begin{aligned}
 812 \Phi(\theta_{t+1}) - \Phi(\theta_t) & \\
 813 & \leq -\frac{\alpha_1}{2} \|\nabla \Phi(\theta_t)\|^2 - \frac{\alpha_1}{2} \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 + \alpha_1 \left\| \nabla \Phi(\theta_t) - \frac{1}{N} \sum_{i=1}^N \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_t, \tau_t) \right\|^2 \\
 814 & + \alpha_1 \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) - \frac{1}{N} \sum_{i=1}^N \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_t, \tau_t) \right\|^2 + \frac{L_{\Phi}}{2} \alpha_1^2 \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
 815 & \leq -\frac{\alpha_1}{2} \|\nabla \Phi(\theta_t)\|^2 - \frac{\alpha_1}{2} (1 - L_{\Phi} \alpha_1) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 + \alpha_1 L^2 \|\phi(\theta_t) - \tau_t\|^2 \\
 816 & + \alpha_1 L^2 \frac{R}{N} \sum_{i=1}^N \sum_{r=1}^R (2 \|\theta_{t,r}^i - \theta_t\|^2 + 2 \|\tau_{t,r}^i - \tau_t\|^2) \\
 817 & \leq -\frac{\alpha_1}{2} \|\nabla \Phi(\theta_t)\|^2 - \frac{\alpha_1}{2} (1 - L_{\Phi} \alpha_1) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
 818 & + \alpha_1 L^2 \|\phi(\theta_t) - \tau_t\|^2 + 2 \alpha_1 L^2 R \Delta_t^{\theta, \tau} \tag{22}
 \end{aligned}$$

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Using the quadratic growth property of μ -PL function $U_{\tilde{\theta}}(\theta, \cdot)$, i.e., $\frac{\mu}{2} \|\tau - \Phi(\theta)\|^2 \leq \max_{\tau'} U_{\tilde{\theta}}(\theta, \tau') - U_{\tilde{\theta}}(\theta, \tau)$, $\forall \theta, \tau$, where $\Phi(\theta) := \arg \max_{\tau'} U_{\tilde{\theta}}(\theta, \tau')$, we have

$$\begin{aligned}
 834 \Phi(\theta_{t+1}) - \Phi(\theta_t) & \\
 835 & \leq -\frac{\alpha_1}{2} \|\nabla \Phi(\theta_t)\|^2 - \frac{\alpha_1}{2} (1 - L_{\Phi} \alpha_1) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
 836 & + \frac{2 \alpha_1 L^2}{\mu} (\Phi(\theta_t) - U_{\tilde{\theta}}(\theta_t, \tau_t)) + 2 \alpha_1 L^2 R \Delta_t^{\theta, \tau} \tag{24}
 \end{aligned}$$

841 \square

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844

845 **Lemma 5.** (Sharma et al., 2022) Suppose the local loss functions $\{U_{\tilde{\theta}}^i\}$ satisfy Assumptions 2 and

846 3. Further, in Algorithm 1, we choose step-sizes α_1, α_2 satisfying $\alpha_2 \leq 1/\mu$, $\frac{\alpha_1}{\alpha_2} \leq \frac{1}{8\kappa^2}$. Then the

847 following inequality holds.

848

$$\begin{aligned}
 849 & \frac{1}{T} \sum_{t=1}^T (\Phi(\theta_t) - U_{\tilde{\theta}}(\theta_t, \tau_t)) \\
 850 & \leq \frac{2(\Phi(\theta_1) - U_{\tilde{\theta}}(\theta_1, \tau_1))}{\alpha_2 \mu T} + \frac{2L^2 R}{\mu \alpha_2} (2\alpha_1(1 - \alpha_2 \mu) + \alpha_2) \frac{1}{T} \sum_{t=1}^T \Delta_t^{\theta, \tau} + (1 - \alpha_2 \mu) \frac{\alpha_1}{\alpha_2 \mu} \frac{1}{T} \sum_{t=1}^T \|\nabla \Phi(\theta_t)\|^2 \\
 851 & + \left[(1 - \alpha_2 \mu) \frac{\alpha_1^2}{2} (L + L_{\Phi}) + \alpha_2 L^2 \alpha_1^2 \right] \frac{2}{\alpha_2 \mu T} \sum_{t=1}^T \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2
 \end{aligned}$$

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860 *Proof.* Using L -smoothness of $U_{\tilde{\theta}}(\theta, \cdot)$

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$$U_{\tilde{\theta}}(\theta_{t+1}, \tau_t) + \langle \nabla_{\tau} U_{\tilde{\theta}}(\theta_{t+1}, \tau_t), \tau_{t+1} - \tau_t \rangle - \frac{L}{2} \|\tau_{t+1} - \tau_t\|^2 \leq U_{\tilde{\theta}}(\theta_{t+1}, \tau_{t+1})$$

864 Using the update rule in Algorithm 1
865

$$\begin{aligned}
866 \quad & U_{\tilde{\theta}}(\theta_{t+1}, \tau_t) \leq U_{\tilde{\theta}}(\theta_{t+1}, \tau_{t+1}) - \alpha_2 \left\langle \nabla_{\tau} U_{\tilde{\theta}}(\theta_{t+1}, \tau_t), \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\rangle \\
867 \quad & + \frac{\alpha_2^2 L}{2} \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
868 \quad & = U_{\tilde{\theta}}(\theta_{t+1}, \tau_{t+1}) - \frac{\alpha_2}{2} \left\| \nabla_{\tau} U_{\tilde{\theta}}(\theta_{t+1}, \tau_t) \right\|^2 - \frac{\alpha_2}{2} (1 - \alpha_2 L) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
869 \quad & + \frac{\alpha_2}{2} \left\| \nabla_{\tau} U_{\tilde{\theta}}(\theta_{t+1}, \tau_t) - \nabla_{\tau} U_{\tilde{\theta}}(\theta_t, \tau_t) + \nabla_{\tau} U_{\tilde{\theta}}(\theta_t, \tau_t) - \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
870 \quad & \leq U_{\tilde{\theta}}(\theta_{t+1}, \tau_{t+1}) - \frac{\alpha_2}{2} \left\| \nabla_{\tau} U_{\tilde{\theta}}(\theta_{t+1}, \tau_t) \right\|^2 - \frac{\alpha_2}{2} (1 - \alpha_2 L) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
871 \quad & + \alpha_2 L^2 \|\theta_{t+1} - \theta_t\|^2 + \alpha_2 L^2 R \Delta_t^{\theta, \tau}, \tag{25}
\end{aligned}$$

883 Note that
884

$$\begin{aligned}
885 \quad & \|\theta_{t+1} - \theta_t\|^2 = \alpha_1^2 \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2. \tag{26}
\end{aligned}$$

889 Also, using Assumption 5,
890

$$\begin{aligned}
891 \quad & \left\| \nabla_{\tau} U_{\tilde{\theta}}(\theta_{t+1}, \tau_t) \right\|^2 \geq 2\mu \left(\max_{\tau} U_{\tilde{\theta}}(\theta_{t+1}, \tau) - U_{\tilde{\theta}}(\theta_{t+1}, \tau_t) \right) = 2\mu (\Phi(\theta_{t+1}) - U_{\tilde{\theta}}(\theta_{t+1}, \tau_t)). \tag{27}
\end{aligned}$$

894 Substituting (26), (27) in (25), and rearranging the terms, we get
895

$$\begin{aligned}
896 \quad & \alpha_2 \mu (\Phi(\theta_{t+1}) - U_{\tilde{\theta}}(\theta_{t+1}, \tau_t)) \\
897 \quad & \leq U_{\tilde{\theta}}(\theta_{t+1}, \tau_{t+1}) - U_{\tilde{\theta}}(\theta_{t+1}, \tau_t) - \frac{\alpha_2}{2} (1 - \alpha_2 L) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
898 \quad & + \alpha_2 L^2 \left[\alpha_1^2 \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \right] + \alpha_2 L^2 R \Delta_t^{\theta, \tau} \\
900 \quad & \Rightarrow (\Phi(\theta_{t+1}) - U_{\tilde{\theta}}(\theta_{t+1}, \tau_{t+1})) \\
901 \quad & \leq (1 - \alpha_2 \mu) (\Phi(\theta_{t+1}) - U_{\tilde{\theta}}(\theta_{t+1}, \tau_t)) - \frac{\alpha_2}{2} (1 - \alpha_2 L) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
902 \quad & + \alpha_1^2 \alpha_2 L^2 \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 + \alpha_2 L^2 R \Delta_t^{\theta, \tau}. \tag{28}
\end{aligned}$$

912 Next, we bound $(\Phi(\theta_{t+1}) - U_{\tilde{\theta}}(\theta_{t+1}, \tau_t))$.
913

$$\begin{aligned}
914 \quad & \Phi(\theta_{t+1}) - U_{\tilde{\theta}}(\theta_{t+1}, \tau_t) \\
915 \quad & = \underbrace{(\Phi(\theta_{t+1}) - \Phi(\theta_t))}_{T_1} + (\Phi(\theta_t) - U_{\tilde{\theta}}(\theta_t, \tau_t)) + \underbrace{(U_{\tilde{\theta}}(\theta_t, \tau_t) - U_{\tilde{\theta}}(\theta_{t+1}, \tau_t))}_{T_2} \tag{29}
\end{aligned}$$

918 T_1 is bounded in Lemma 4. We next bound T_2 . Using L -smoothness of $U_{\tilde{\theta}}(\cdot, \tau_t)$,

$$\begin{aligned}
& U_{\tilde{\theta}}(\theta_t, \tau_t) + \langle \nabla_{\theta} U_{\tilde{\theta}}(\theta_t, \tau_t), \theta_{t+1} - \theta_t \rangle - \frac{L}{2} \|\theta_{t+1} - \theta_t\|^2 \leq U_{\tilde{\theta}}(\theta_{t+1}, \tau_t) \\
\Rightarrow T_2 &= (U_{\tilde{\theta}}(\theta_t, \tau_t) - U_{\tilde{\theta}}(\theta_{t+1}, \tau_t)) \\
&\leq \alpha_1 \left\langle \nabla_{\theta} U_{\tilde{\theta}}(\theta_t, \tau_t), \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\rangle + \frac{\alpha_1^2 L}{2} \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
&\leq \frac{\alpha_1}{2} \left(\|\nabla_{\theta} U_{\tilde{\theta}}(\theta_t, \tau_t)\|^2 + \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \right) + \frac{\alpha_1^2 L}{2} \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
&\leq \alpha_1 \left(\|\nabla \Phi(\theta_t)\|^2 + \|\nabla_{\theta} U_{\tilde{\theta}}(\theta_t, \tau_t) - \nabla \Phi(\theta_t)\|^2 \right) + \frac{\alpha_1}{2} (1 + \alpha_1 L) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
&\stackrel{(a)}{\leq} \alpha_1 \|\nabla \Phi(\theta_t)\|^2 + \alpha_1 L^2 \|\tau_t - \tau^*(\theta_t)\|^2 + \frac{\alpha_1}{2} (1 + \alpha_1 L) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
&\leq \alpha_1 \|\nabla \Phi(\theta_t)\|^2 + \frac{2\alpha_1 L^2}{\mu} (\Phi(\theta_t) - U_{\tilde{\theta}}(\theta_t, \tau_t)) + \frac{\alpha_1}{2} (1 + \alpha_1 L) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2. \tag{30}
\end{aligned}$$

944 where (a) follows from Assumption 2 and Assumption 3. Also, recall that $\tau^*(\theta) \in$
945 $\arg \max_{\tau'} U_{\tilde{\theta}}(\theta, \tau')$. (30) follows from the quadratic growth property of μ -PL functions. Sub-
946 stituting the bounds on T_1, T_2 from Lemma 4 and (30) respectively, in (28), we get

$$\begin{aligned}
& (\Phi(\theta_{t+1}) - U_{\tilde{\theta}}(\theta_{t+1}, \tau_{t+1})) \\
\leq & (1 - \alpha_2 \mu) \left(1 + \frac{4\alpha_1 L^2}{\mu} \right) (\Phi(\theta_t) - U_{\tilde{\theta}}(\theta_t, \tau_t)) \\
& + (1 - \alpha_2 \mu) \left[-\frac{\alpha_1}{2} \|\nabla \Phi(\theta_t)\|^2 - \frac{\alpha_1}{2} (1 - L_{\Phi} \alpha_1) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 + 2\alpha_1 L^2 R \Delta_t^{\theta, \tau} \right] \\
& + (1 - \alpha_2 \mu) \left[\alpha_1 \|\nabla \Phi(\theta_t)\|^2 + \frac{\alpha_1}{2} (1 + \alpha_1 L) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \right. \\
& \left. - \frac{\alpha_2}{2} (1 - \alpha_2 L) \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \right. \\
& \left. + \alpha_1^2 \alpha_2 L^2 \left\| \frac{1}{N} \sum_{i=1}^N \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 + \alpha_2 L^2 R \Delta_t^{\theta, \tau} \right. \\
& \leq \left(1 - \frac{\alpha_2 \mu}{2} \right) (\Phi(\theta_t) - U_{\tilde{\theta}}(\theta_t, \tau_t)) + \alpha_2 L^2 R \Delta_t^{\theta, \tau} \\
& + \left[(1 - \alpha_2 \mu) \frac{\alpha_1^2}{2} (L + L_{\Phi}) + \alpha_2 L^2 \alpha_1^2 \right] \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
& + (1 - \alpha_2 \mu) \left[\frac{\alpha_1}{2} \|\nabla \Phi(\theta_t)\|^2 + 2\alpha_1 L^2 R \Delta_t^{\theta, \tau} \right], \tag{31}
\end{aligned}$$

972 where we choose α_1 such that $(1 - \alpha_2\mu) \left(1 + \frac{4\alpha_1 L^2}{\mu}\right) \leq \left(1 - \frac{\alpha_2\mu}{2}\right)$. This holds if $\frac{4\alpha_1 L^2}{\mu} \leq \frac{\alpha_2\mu}{2} \Rightarrow$
 973 $\alpha_1 \leq \frac{\alpha_2}{8\kappa^2}$. Summing (31) over $t = 1, \dots, T$, and rearranging the terms, we get
 974

$$\begin{aligned} 975 \quad & \frac{1}{T} \sum_{t=1}^T (\Phi(\theta_{t+1}) - U_{\tilde{\theta}}(\theta_{t+1}, \tau_{t+1})) \\ 976 \quad & \leq \left(1 - \frac{\alpha_2\mu}{2}\right) \frac{1}{T} \sum_{t=1}^T (\Phi(\theta_t) - U_{\tilde{\theta}}(\theta_t, \tau_t)) + L^2 R (2\alpha_1(1 - \alpha_2\mu) + \alpha_2) \frac{1}{T} \sum_{t=1}^T \Delta_t^{\theta, \tau} \\ 977 \quad & \quad + \left[(1 - \alpha_2\mu) \frac{\alpha_1^2}{2} (L + L_{\Phi}) + \alpha_2 L^2 \alpha_1^2\right] \frac{1}{T} \sum_{t=1}^T \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 + (1 - \alpha_2\mu) \frac{\alpha_1}{2} \frac{1}{T} \sum_{t=1}^T \|\nabla \Phi(\theta_t)\|^2 \end{aligned}$$

981 Rearranging the terms, we get
 982

$$\begin{aligned} 983 \quad & \frac{1}{T} \sum_{t=1}^T (\Phi(\theta_t) - U_{\tilde{\theta}}(\theta_t, \tau_t)) \\ 984 \quad & \leq \frac{2}{\alpha_2\mu} \left[\frac{\Phi(\theta_1) - U_{\tilde{\theta}}(\theta_1, \tau_1)}{T} - \frac{(\Phi(\theta_{T+1}) - U_{\tilde{\theta}}(\theta_{T+1}, \tau_{T+1}))}{T} \right] + \frac{2L^2 R}{\alpha_2\mu} (2\alpha_1(1 - \alpha_2\mu) + \alpha_2) \frac{1}{T} \sum_{t=1}^T \Delta_t^{\theta, \tau} \\ 985 \quad & \quad + \left[(1 - \alpha_2\mu) \frac{\alpha_1^2}{2} (L + L_{\Phi}) + \alpha_2 L^2 \alpha_1^2\right] \frac{2}{\alpha_2\mu T} \sum_{t=1}^T \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 + (1 - \alpha_2\mu) \frac{\alpha_1}{\alpha_2\mu T} \sum_{t=1}^T \|\nabla \Phi(\theta_t)\|^2 \\ 986 \quad & \leq \frac{2(\Phi(\theta_1) - U_{\tilde{\theta}}(\theta_1, \tau_1))}{\alpha_2\mu T} + \frac{2L^2 R}{\alpha_2\mu} (2\alpha_1(1 - \alpha_2\mu) + \alpha_2) \frac{1}{T} \sum_{t=1}^T \Delta_t^{\theta, \tau} \\ 987 \quad & \quad + \left[(1 - \alpha_2\mu) \frac{\alpha_1^2}{2} (L + L_{\Phi}) + \alpha_2 L^2 \alpha_1^2\right] \frac{2}{\alpha_2\mu T} \sum_{t=1}^T \left\| \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 + (1 - \alpha_2\mu) \frac{\alpha_1}{\alpha_2\mu T} \sum_{t=1}^T \|\nabla \Phi(\theta_t)\|^2 \end{aligned}$$

988 since $\Phi(\theta_T) := \arg \max_{\tau} U_{\tilde{\theta}}(\theta_T, \tau)$, which concludes the proof. \square
 989

1000 **Lemma 6.** Suppose the local loss functions $\{U_{\tilde{\theta}}^i\}$ satisfy Assumptions 2 and 3. Further, in Algorithm
 1001 1, using bounded gradient assumption, i.e., $\|\nabla U_{\tilde{\theta}}^i(\theta, \tau)\| \leq G$, we choose step-sizes $\alpha_1, \alpha_2 \leq \frac{1}{8RL}$.
 1002 Then, the iterates $\{\theta_t, \tau_t\}$ generated by Algorithm 1 satisfy
 1003

$$\begin{aligned} 1004 \quad & \frac{1}{T} \sum_{t=1}^T \Delta_t^{\theta, \tau} := \frac{1}{T} \sum_{t=1}^T \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \left(\|\theta_{t,r}^i - \theta_t\|^2 + \|\tau_{t,r}^i - \tau_t\|^2 \right) \\ 1005 \quad & \leq 6R(R-1)^2 [(\zeta_{\theta}^2 \alpha_1^2 + \zeta_{\tau}^2 \alpha_2^2) + (\alpha_1^2 + \alpha_2^2) G^2]. \end{aligned}$$

1006 **Proof of Lemma 6.** We define the separate synchronization errors for θ and τ
 1007

$$1008 \quad \Delta_t^{\theta} := \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \|\theta_{t,r}^i - \theta_t\|^2, \quad \Delta_t^{\tau} := \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \|\tau_{t,r}^i - \tau_t\|^2,$$

1009 such that $\Delta_t^{\theta, \tau} = \Delta_t^{\theta} + \Delta_t^{\tau}$. We first bound the θ - synchronization error Δ_t^{θ} . Then,
 1010

$$\begin{aligned} 1011 \quad & \Delta_t^{\theta} := \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \|\theta_{t,r}^i - \theta_t\|^2 \\ 1012 \quad & = \alpha_1^2 \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \left\| \sum_{j=1}^r \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,j}^i, \tau_{t,j}^i) \right\|^2 \\ 1013 \quad & \leq \alpha_1^2 \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R (r-1) \sum_{j=1}^r \|\nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,j}^i, \tau_{t,j}^i)\|^2. \end{aligned}$$

1026 This can be written as
1027

$$\begin{aligned}
1028 \Delta_t^\theta &\stackrel{(a)}{\leq} \alpha_1^2 \frac{1}{N} \sum_{i=1}^N \sum_{j=1}^{R-1} \|\nabla_\theta U_{\bar{\theta}}^i(\theta_{t,j}^i, \tau_{t,j}^i)\|^2 \sum_{r=j+1}^R (r-1) \\
1029 &\stackrel{(b)}{\leq} \alpha_1^2 \frac{(R-1)^2}{2} \frac{1}{N} \sum_{i=1}^N \sum_{j=1}^{R-1} \|\nabla_\theta U_{\bar{\theta}}^i(\theta_{t,j}^i, \tau_{t,j}^i)\|^2 \\
1030 &\stackrel{(c)}{\leq} \alpha_1^2 \frac{(R-1)^2}{2} \frac{1}{N} \sum_{i=1}^N \sum_{j=1}^R \|\nabla_\theta U_{\bar{\theta}}^i(\theta_{t,j}^i, \tau_{t,j}^i)\|^2,
\end{aligned}$$

1031 where (a) follows from rewriting the sum, (b) follows since $\sum_{r=j+1}^R (r-1) \leq \frac{R^2}{2}$ and (c) follows
1032 because a positive quantity is being added. Now,

$$\begin{aligned}
1033 \Delta_t^\theta &\leq \alpha_1^2 \frac{(R-1)^2}{2} \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \|\nabla_\theta U_{\bar{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) - \nabla_\theta U_{\bar{\theta}}^i(\theta_t, \tau_t) + \nabla_\theta U_{\bar{\theta}}^i(\theta_t, \tau_t) - \nabla_\theta U_{\bar{\theta}}(\theta_t, \tau_t) + \nabla_\theta U_{\bar{\theta}}(\theta_t, \tau_t)\|^2 \\
1034 &\leq \alpha_1^2 \frac{(R-1)^2}{2} \frac{1}{N} \sum_{i=1}^N \sum_{r=1}^R \left[3 \|\nabla_\theta U_{\bar{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) - \nabla_\theta U_{\bar{\theta}}^i(\theta_t, \tau_t)\|^2 + 3 \|\nabla_\theta U_{\bar{\theta}}^i(\theta_t, \tau_t) - \nabla_\theta U_{\bar{\theta}}(\theta_t, \tau_t)\|^2 \right] \\
1035 &\quad + 3\alpha_1^2 \frac{R(R-1)^2}{2} \|\nabla_\theta U_{\bar{\theta}}(\theta_t, \tau_t)\|^2 \\
1036 &\leq 6L^2 \alpha_1^2 \frac{(R-1)^2}{2} \Delta_t^{\theta,\tau} + 3\zeta_\theta^2 \alpha_1^2 \frac{R(R-1)^2}{2} + 3\alpha_1^2 \frac{R(R-1)^2}{2} \|\nabla_\theta U_{\bar{\theta}}(\theta_t, \tau_t)\|^2. \quad (32)
\end{aligned}$$

1037 Similarly, for the synchronization error Δ_t^τ , we have

$$1038 \Delta_t^\tau \leq 6L^2 \alpha_2^2 \frac{(R-1)^2}{2} \Delta_t^{\theta,\tau} + 3\zeta_\tau^2 \alpha_2^2 \frac{R(R-1)^2}{2} + 3\alpha_2^2 \frac{R(R-1)^2}{2} \|\nabla_\tau U_{\bar{\theta}}(\theta_t, \tau_t)\|^2. \quad (33)$$

1039 Using bounded gradient assumption, i.e., $\|\nabla U_{\bar{\theta}}^i(\theta, \tau)\| \leq G$, and adding (32) and (33), we obtain

$$1040 \Delta_t^{\theta,\tau} \leq 6L^2(\alpha_1^2 + \alpha_2^2)(R-1)^2 \Delta_t^{\theta,\tau} + 3(\zeta_\theta^2 \alpha_1^2 + \zeta_\tau^2 \alpha_2^2)R(R-1)^2 + 3(\alpha_1^2 + \alpha_2^2)R(R-1)^2 G^2.$$

1041 For our choice of α_1 and α_2 , we have $6L^2(\alpha_1^2 + \alpha_2^2)(R-1)^2 \leq \frac{1}{2}$, thus

$$1042 \Delta_t^{\theta,\tau} \leq 6R(R-1)^2 [(\zeta_\theta^2 \alpha_1^2 + \zeta_\tau^2 \alpha_2^2) + (\alpha_1^2 + \alpha_2^2)G^2].$$

1043 Averaging across all the communication rounds $t = 1, \dots, T$ proves the lemma. □

1044 **Theorem 4** (Convergence of FEDGDA). *Suppose the local loss functions $\{U_{\bar{\theta}}^i\}_i$ satisfy Assumptions
1045 2,3 and have bounded gradients, and the global function $U_{\bar{\theta}}$ satisfies 5. Suppose the step-sizes α_1, α_2
1046 are chosen such that $\alpha_2 \leq \frac{1}{8LR}$, $\frac{\alpha_1}{\alpha_2} = \frac{1}{8\kappa^2}$, where $\kappa = \frac{L}{\mu}$ is the condition number. Then for the
1047 output $\bar{\theta}_T$ of Algorithm 1, the following holds.*

$$\begin{aligned}
1048 \|\nabla \Phi(\bar{\theta}_T)\|^2 &= \frac{1}{T} \sum_{t=1}^T \|\nabla \Phi(\theta_t)\|^2 \\
1049 &\leq \underbrace{\mathcal{O}\left(\kappa^2 \frac{\Delta_\Phi}{\alpha_2 T}\right)}_{\text{Error with full synchronization}} + \underbrace{\mathcal{O}\left(L^2 \kappa^2 R(R-1)^2 [\alpha_2^2 (G^2 + \zeta_\tau^2) + \alpha_1^2 \zeta_\theta^2]\right)}_{\text{Error due to local updates}}, \quad (34)
\end{aligned}$$

1050 where $\Phi(\theta) := \max_\tau U_{\bar{\theta}}(\theta, \tau)$ is the envelope function, $\Delta_\Phi := \Phi(\theta_1) - \min_\theta \Phi(\theta)$. Using $\alpha_2 = \sqrt{\frac{N}{LT}}$ and $\alpha_1 = \frac{1}{8\kappa^2} \sqrt{\frac{N}{LT}}$, we get

$$1051 \|\nabla \Phi(\bar{\theta}_T)\|^2 \leq \mathcal{O}\left(\frac{\kappa^2 \Delta_\Phi}{\sqrt{NT}} + \kappa^2 R(R-1)^2 \frac{N(\sigma^2 + \zeta_\theta^2 + \zeta_\tau^2)}{T}\right).$$

1080 *Proof.* We start by summing the expression in Lemma 4 over $t = 1, \dots, T$.
1081

$$\begin{aligned}
1082 \frac{1}{T} \sum_{t=1}^T (\Phi(\theta_{t+1}) - \Phi(\theta_t)) &\leq -\frac{\alpha_1}{2} \frac{1}{T} \sum_{t=1}^T \|\nabla \Phi(\theta_t)\|^2 - \frac{\alpha_1}{2} (1 - L_\Phi \alpha_1) \frac{1}{T} \sum_{t=1}^T \left\| \frac{1}{N} \sum_{i=1}^n \sum_{r=1}^R \nabla_\theta U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
1083 &\quad + \frac{2\alpha_1 L^2}{\mu} \frac{1}{T} \sum_{t=1}^T [\Phi(\theta_t) - U_{\tilde{\theta}}(\theta_t, \tau_t)] + 2\alpha_1 L^2 R \frac{1}{T} \sum_{t=1}^T \Delta_t^{\theta, \tau}. \quad (35)
\end{aligned}$$

1088 Substituting the bound on $\frac{1}{T} \sum_{t=1}^T \Delta_t^{\theta, \tau}$ from Lemma 6, and the bound on
1089 $\frac{1}{T} \sum_{t=1}^T (\Phi(\theta_t) - U_{\tilde{\theta}}(\theta_t, \tau_t))$ from Lemma 5, and rearranging the terms in (35), we get
1090

$$\begin{aligned}
1092 \frac{1}{T} (\Phi(\theta_T) - \Phi(\theta_1)) &\leq -\underbrace{\left(\frac{\alpha_1}{2} - (1 - \alpha_2 \mu) \frac{2\alpha_1^2 L^2}{\alpha_2 \mu^2} \right)}_{\geq \alpha_1/4} \frac{1}{T} \sum_{t=1}^T \|\nabla \Phi(\theta_t)\|^2 \\
1094 &\quad - \underbrace{\frac{\alpha_1}{2} \left(1 - L_\Phi \alpha_1 - \frac{8L^2}{\mu^2 \alpha_2} \left[(1 - \alpha_2 \mu) \frac{\alpha_1^2}{2} (L + L_\Phi) + \alpha_2 L^2 \alpha_1^2 \right] \right)}_{\geq 0} \frac{1}{T} \sum_{t=1}^T \left\| \frac{1}{N} \sum_{i=1}^n \nabla_\theta U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) \right\|^2 \\
1096 &\quad + \left[\frac{2\alpha_1 L^2}{\mu} \left(\frac{2L^2 R}{\mu} + \frac{4\alpha_1 R L^2 (1 - \alpha_2 \mu)}{\mu \alpha_2} \right) + 2\alpha_1 L^2 R \right] \frac{1}{T} \sum_{t=1}^T \Delta_t^{\theta, \tau} \\
1098 &\quad + \frac{4\alpha_1 L^2}{\mu} \frac{(\Phi(\theta_1) - U_{\tilde{\theta}}(\theta_1, \tau_1))}{\alpha_2 \mu T}. \quad (36)
\end{aligned}$$

1102 Here, $\frac{\alpha_1}{2} - \frac{2\alpha_1^2(1-\mu\alpha_2)L^2}{\mu^2\alpha_2} \geq \frac{\alpha_1}{4}$ holds since $\frac{\alpha_1}{\alpha_2} \leq \frac{1}{8\kappa^2}$. Also, $1 - L_\Phi \alpha_1 - \frac{8L^2}{\mu^2\alpha_2} \left[(1 - \alpha_2 \mu) \frac{\alpha_1^2}{2} (L + L_\Phi) + \alpha_2 L^2 \alpha_1^2 \right] \geq 0$ follows from the bounds on α_1, α_2 . Rearranging the terms in Equation (36) and using lemma (6), we get

$$\begin{aligned}
1113 \frac{1}{T} \sum_{t=1}^T \|\nabla \Phi(\theta_t)\|^2 &\leq \frac{4(\Phi(\theta_1) - \Phi(\theta_T))}{\alpha_1 T} \\
1114 &\quad + \frac{4}{\alpha_1} 2\alpha_1 L^2 R \left[1 + 2\kappa^2 + 4\kappa^2 \frac{\alpha_1}{\alpha_2} \right] 6R(R-1)^2 \left[(\alpha_1^2 + \alpha_2^2) G^2 + (\alpha_1^2 \zeta_\theta^2 + \alpha_2^2 \zeta_\tau^2) \right] \\
1115 &\quad + \frac{4}{\alpha_1} \frac{4\alpha_1 \kappa^2}{\alpha_2} \frac{(\Phi(\theta_1) - U_{\tilde{\theta}}(\theta_1, \tau_1))}{T} \\
1116 &\stackrel{(a)}{\leq} \frac{4\Delta_\Phi}{\alpha_1 T} + 8L^2 R [2 + 2\kappa^2] 6R(R-1)^2 \left[(\alpha_1^2 + \alpha_2^2) G^2 + (\alpha_1^2 \zeta_\theta^2 + \alpha_2^2 \zeta_\tau^2) \right] + \frac{16\kappa^2 \Delta_\Phi}{\alpha_2 T} \\
1117 &\stackrel{(b)}{\leq} \frac{4\Delta_\Phi}{\alpha_1 T} + 192L^2 \kappa^2 R(R-1)^2 \left[(\alpha_1^2 + \alpha_2^2) G^2 + \alpha_1^2 \zeta_\theta^2 + \alpha_2^2 \zeta_\tau^2 \right] + \frac{16\kappa^2 \Delta_\Phi}{\alpha_2 T} \\
1118 &= \mathcal{O} \left(\frac{\Delta_\Phi}{\alpha_1 T} + \kappa^2 \frac{\Delta_\Phi}{\alpha_2 T} + L^2 \kappa^2 R(R-1)^2 \left[(\alpha_1^2 + \alpha_2^2) G^2 + \alpha_1^2 \zeta_\theta^2 + \alpha_2^2 \zeta_\tau^2 \right] \right). \\
1119 &= \underbrace{\mathcal{O} \left(\kappa^2 \frac{\Delta_\Phi}{\alpha_2 T} \right)}_{\text{Error with full synchronization}} + \underbrace{\mathcal{O} \left(L^2 \kappa^2 R(R-1)^2 [\alpha_2^2 (G^2 + \zeta_\tau^2) + \alpha_1^2 \zeta_\theta^2] \right)}_{\text{Error due to local updates}}. \quad (\text{since } \kappa \geq 1)
\end{aligned}$$

1131 where, we denote $\Delta_\Phi := \Phi(\theta_1) - \min_\theta \Phi(\theta)$. (a) follows from $\frac{\alpha_1}{\alpha_2} \leq \frac{1}{8\kappa^2}$; (b) follows since $\kappa \geq 1$
1132 and $L_\Phi \geq L$. Therefore, $\frac{8\kappa^2 \alpha_1}{\alpha_2} \frac{\alpha_1 \sigma^2}{N} (L + L_\Phi) \leq \frac{\alpha_1 \sigma^2}{N} (L + L_\Phi) \leq \frac{2L_\Phi \alpha_1 \sigma^2}{N}$, which results in
1133 Equation (34).

1134 Using $\alpha_2 = \sqrt{\frac{N}{LT}}$ and $\alpha_1 = \frac{1}{8\kappa^2} \sqrt{\frac{N}{LT}} \leq \frac{\alpha_2}{8\kappa^2}$, and since $\kappa \geq 1$, we get
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$$\frac{1}{T} \sum_{t=1}^T \|\nabla \Phi(\theta_t)\|^2 \leq \mathcal{O} \left(\frac{\kappa^2 \Delta_\Phi}{\sqrt{NT}} + \kappa^2 R(R-1)^2 \frac{N}{T} \left[G^2 + \frac{\zeta_\theta^2}{\kappa^4} + \zeta_\tau^2 \right] \right).$$

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1139 \square

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1142 **B PROOFS**
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1144 **B.1 PROOF OF LEMMA 1**

1145 **Lemma 7** (Restatement of Lemma 1). *Let $\mathcal{F} = \text{span}\{f_j^i \mid i \in [N], j \in [m]\}$. An equivalent
1146 objective function for the federated moment estimation optimization problem (16) is given by:*
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$$\|\psi_N(f; \theta)\|_\theta^2 = \sup_{\substack{f^i \in \mathcal{F} \\ \forall i \in [N]}} \frac{1}{N} \sum_{i=1}^N \left(\psi_{n_i}(f^i; \theta) - \frac{1}{4} \mathcal{C}_{\tilde{\theta}}(f^i; f^i) \right), \text{ where} \quad (37)$$

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$$\psi_{n_i}(f^i; \theta) := \frac{1}{n_i} \sum_{k=1}^{n_i} f^i(Z_k^i)(Y_k^i - g^i(X_k^i; \theta)), \text{ and } \mathcal{C}_{\tilde{\theta}}(f^i, f^i) := \frac{1}{n_i} \sum_{k=1}^{n_i} (f^i(Z_k^i))^2 (Y_k^i - g^i(X_k^i; \tilde{\theta}))^2.$$

1154

1155 *Proof.* Let $\psi = (\frac{1}{N} \sum_{i=1}^N \psi_{n_i}(f_1^i; \theta), \frac{1}{N} \sum_{i=1}^N \psi_{n_i}(f_2^i; \theta), \dots, \frac{1}{N} \sum_{i=1}^N \psi_{n_i}(f_m^i; \theta))$.
1156

1157 We know that $\|\psi\|^2 = v^\top C_{\tilde{\theta}}^{-1} v$ and the associated dual norm is obtained as $\|\psi\|_*^2 = \sup_{\|v\|_* \leq 1} v^\top v =
1158 v^\top C_{\tilde{\theta}} v$.
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1160 Using the definition of the dual norm,
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$$\begin{aligned} \|\psi\| &= \sup_{\|v\|_* \leq 1} v^\top \psi \\ \|\psi\|^2 &= \sup_{\|v\|_* \leq \|\psi\|} v^\top \psi \\ \|\psi\|^2 &= \sup_{v^\top C_{\tilde{\theta}} v \leq \|\psi\|^2} v^\top \psi. \end{aligned} \quad (38)$$

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1169 We now find the equivalent dual optimization problem for (38).
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1171 The Lagrangian of the constrained maximization problem (38) is given as
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$$\mathcal{L}(v, \lambda) = v^\top \psi + \lambda(v^\top C_{\tilde{\theta}} v - \|\psi\|^2), \text{ where } \lambda \leq 0.$$

1173 To maximize $\mathcal{L}(v, \lambda)$ w.r.t. v , put $\frac{\partial \mathcal{L}}{\partial v} = \psi + 2\lambda C_{\tilde{\theta}} v = 0$ to obtain $v = \frac{-1}{2\lambda} C_{\tilde{\theta}}^{-1} \psi$.
1174

1175 When $\|\psi\| > 0$, $v = 0$ satisfies Slater's condition as a strictly feasible interior point of the constraint
1176 $v^\top C_{\tilde{\theta}} v - \|\psi\|^2 \leq 0$. Since $C_{\tilde{\theta}} \succeq 0$, the quadratic form $v^\top C_{\tilde{\theta}} v$ is convex in v , and the objective $v^\top \psi$
1177 is linear. Hence, for this convex optimization problem, the Slater's condition applies. Thus, strong
1178 duality holds. Substituting $v = \frac{-1}{2\lambda} C_{\tilde{\theta}}^{-1} \psi$ in the Lagrangian gives
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$$\begin{aligned} \mathcal{L}^*(\lambda) &= \frac{-1}{2\lambda} \psi^\top C_{\tilde{\theta}}^{-1} \psi + \frac{1}{4\lambda} \psi^\top C_{\tilde{\theta}}^{-1} \psi - \lambda \|\psi\|^2 \\ &= -\frac{\|\psi\|^2}{4\lambda} - \lambda \|\psi\|^2. \end{aligned}$$

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1185 Hence, the dual becomes $\|\psi\|^2 = \inf_{\lambda < 0} \{\mathcal{L}^*(\lambda)\}$. Thus, the equivalent dual optimization problem
1186 for (38) is given as
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$$\|\psi\|^2 = \inf_{\lambda < 0} \left\{ -\frac{\|\psi\|^2}{4\lambda} - \lambda \|\psi\|^2 \right\}. \quad (39)$$

Putting $\frac{\partial \mathcal{L}}{\partial \lambda} = \frac{\|\psi\|^2}{4\lambda^2} - \|\psi\|^2 = 0$ gives $\lambda = \frac{-1}{2}$. Thus, due to strong duality $\|\psi\|^2 = \sup_v \mathcal{L}(v, \frac{-1}{2}) = \sup_v v^\top \psi - \frac{1}{2}(v^\top C_{\tilde{\theta}} v - \|\psi\|^2)$.

Rewriting it $\frac{1}{2}\|\psi\|^2 = \sup_v v^\top \psi - \frac{1}{2}v^\top C_{\tilde{\theta}} v$ and substituting $u = 2v$

$$\|\psi\|^2 = \sup_u u^\top \psi - \frac{1}{4}u^\top C_{\tilde{\theta}} u.$$

Using the change of variables $u \rightarrow v$

$$\|\psi\|^2 = \sup_v v^\top \psi - \frac{1}{4}v^\top C_{\tilde{\theta}} v.$$

Now, we want to find a function form for the optimization problem mentioned above.

Consider a finite-dimensional functional spaces $\mathcal{F}^i = \text{span}\{f_1^i, f_2^i, \dots, f_m^i\}$ for each client i . Hence, for $f^i \in \mathcal{F}^i$

$$f^i = \sum_{j=1}^m v_j f_j^i.$$

Since all the clients share the same neural network architecture, we define a global functional space \mathcal{F} as

$$\mathcal{F} = \text{span}\{f_j^i \mid i \in [N], j \in [m]\}.$$

Therefore, v corresponds to f^i such that

$$f^i = \sum_{c=1}^N \sum_{j=1}^m v_j^i f_j^c, \text{ where } v_j^i = \begin{cases} v_j & \text{if } c = i \\ 0 & \text{if } c \neq i \end{cases}$$

Hence,

$$\begin{aligned} v^\top \psi &= \frac{1}{N} \sum_{i=1}^N \sum_{j=1}^m v_j \psi_{n_i}(f_j^i; \theta) \\ &= \frac{1}{N} \sum_{i=1}^N \frac{1}{n_i} \sum_{k=1}^{n_i} f^i(Z_k^i)(Y_k^i - g^i(X_k^i; \theta)). \end{aligned}$$

Similarly,

$$\begin{aligned} v^\top C_{\tilde{\theta}} v &= \sum_{p=1}^m \sum_{q=1}^m v_p v_q [C_{\tilde{\theta}}]_{pq} \\ &= \sum_{p=1}^m \sum_{q=1}^m v_p v_q \frac{1}{N} \sum_{i=1}^N \frac{1}{n_i} \sum_{k=1}^{n_i} f_p^i(Z_k^i) f_q^i(Z_k^i) (Y_k^i - g^i(X_k^i; \tilde{\theta})) \\ &= \frac{1}{N} \sum_{i=1}^N \frac{1}{n_i} \sum_{k=1}^{n_i} \sum_{p=1}^m v_p f_p^i(Z_k^i) \sum_{q=1}^m v_q f_q^i(Z_k^i) (Y_k^i - g^i(X_k^i; \tilde{\theta}))^2 \\ &= \frac{1}{N} \sum_{i=1}^N \frac{1}{n_i} \sum_{k=1}^{n_i} (f^i(Z_k^i))^2 (Y_k^i - g^i(X_k^i; \tilde{\theta}))^2 \\ &= \frac{1}{N} \sum_{i=1}^N \mathcal{C}_{\tilde{\theta}}(f^i, f^i). \end{aligned}$$

Thus, using the linear isomorphism between \mathbb{R}^m and $\text{span}\{f_1^i, f_2^i, \dots, f_m^i\}$, using $v^\top \psi = \frac{1}{N} \sum_{i=1}^N \psi_{n_i}(f^i; \theta)$ and $v^\top C_{\tilde{\theta}} v = \frac{1}{N} \sum_{i=1}^N \mathcal{C}_{\tilde{\theta}}(f^i, f^i)$, we can write the objective in functional form as

$$\|\psi\|^2 = \sup_{\substack{f^i \in \mathcal{F} \\ \forall i \in [N]}} \frac{1}{N} \sum_{i=1}^N \left(\psi_{n_i}(f^i; \theta) - \frac{1}{4} \mathcal{C}_{\tilde{\theta}}(f^i, f^i) \right).$$

This gives us the desired result.

1241

□

1242 B.2 PROOF OF THEOREM 1
1243

1244 **Theorem 5** (Restatement of Theorem 1). *Under assumptions 1, 2, 3 and 4, a minimax solution
1245 $(\hat{\theta}, \hat{\tau})$ of federated optimization problem (17) that satisfies the equilibrium condition as in def-
1246 initition 1: $U_{\tilde{\theta}}(\hat{\theta}, \tau) \leq U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \leq \max_{\tau' : \|\tau' - \hat{\tau}\| \leq h(\delta)} U_{\tilde{\theta}}(\theta, \tau')$, is an \mathcal{E} -approximate federated
1247 equilibrium solution as defined in 3, where the approximation error ε^i for each client $i \in [N]$
1248 lies in: $\max\{\zeta_{\theta}^i, \zeta_{\tau}^i\} \leq \varepsilon^i \leq \min\{\alpha - \rho_{\tau}^i, \beta - B^i\}$ for $\rho_{\tau}^i < \alpha$ and $B^i > \beta$, such that
1249 $\alpha := \left| \lambda_{\max} \left(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \right) \right|$, $\beta := \lambda_{\min} \left(\left[\nabla_{\theta\theta}^2 U_{\tilde{\theta}} - \nabla_{\theta\tau}^2 U_{\tilde{\theta}} \left(\nabla_{\tau\tau}^2 U_{\tilde{\theta}} \right)^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}} \right] (\hat{\theta}, \hat{\tau}) \right)$ and
1250 $B^i := \rho_{\theta}^i + L \rho_{\theta\tau}^i \frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)|} + L \rho_{\tau\theta}^i \frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)|} + L^2 \rho_{\tau}^i \frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i) \cdot \lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}})|}$.*

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1252
1253 *Proof.* The pure-strategy Stackelberg equilibrium for the federated objective is:

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1255
$$U_{\tilde{\theta}}(\hat{\theta}, \tau) \leq U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \leq \max_{\tau' : \|\tau' - \tau^*\| \leq h(\delta)} U_{\tilde{\theta}}(\theta, \tau'), \quad (40)$$

1256 We want to show that the ε^i - approximate equilibrium for each client's objective $U_{\tilde{\theta}}^i$ also hold
1257 individually.

1258 The first-order necessary condition for (40) to hold is $\nabla_{\theta} U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) = 0$ and $\nabla_{\tau} U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) = 0$. Thus,
1259 $\left\| \nabla_{\theta} U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \right\|^2 = 0$.

1260 Consider

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$$\begin{aligned} \left\| \nabla_{\theta} U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \right\|^2 &= \left\| \nabla_{\theta} U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) - \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) + \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\|^2 \\ &= \left\| \nabla_{\theta} U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) - \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\|^2 + \left\| \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\|^2 \\ &\quad + 2 \left(\nabla_{\theta} U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) - \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right)^{\top} \left(\nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right) \end{aligned}$$

1264 Rearranging

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$$\begin{aligned} 2 \left(\nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) - \nabla_{\theta} U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \right)^{\top} \left(\nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right) - \left\| \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\|^2 &= \left\| \nabla_{\theta} U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) - \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\|^2 \\ 2 \left\| \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\|^2 - \left\| \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\|^2 &= \left\| \nabla_{\theta} U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) - \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\|^2 \end{aligned}$$

1270 Using gradient heterogeneity assumption (3) on R.H.S.

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$$\left\| \nabla_{\theta} U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) - \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\|^2 \leq (\zeta_{\theta}^i)^2$$

1275 Thus, we obtain $\left\| \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\| \leq \zeta_{\theta}^i$. Similarly, $\left\| \nabla_{\tau} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\| \leq \zeta_{\tau}^i$.

1276 In the special case, when $\zeta_{\theta}^i = 0$ and $\zeta_{\tau}^i = 0$, thus we will have $\left\| \nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\|^2 = \left\| \nabla_{\tau} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \right\|^2 = 0$ for all $i \in [N]$, which gives $\nabla_{\theta} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) = \nabla_{\tau} U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) = 0$ for all clients i .

1277 Next, we prove that each client satisfies the second-order necessary condition approximately. Since
1278 $(\hat{\theta}, \hat{\tau})$ satisfy the equilibrium condition (40), the second-order necessary condition holds for the global
1279 function $U_{\tilde{\theta}}$, i.e. $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \preceq \mathbf{0}$. We now prove that $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \preceq \mathbf{0}$.

1280 Using assumption 1, the hessian is symmetric. Thus, $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \preceq \mathbf{0}$ implies
1281 $\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau})) \leq 0$, where λ_{\max} is the largest eigenvalue of the hessian. Suppose,
1282 $\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau})) = -\alpha$, for some $\alpha \geq 0$.

1283 We can write $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) = \nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) + \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau})$.

1284 Using a corollary of Weyl's theorem (Horn & Johnson, 2012) for real symmetric matrices A and B ,
1285 $\lambda_{\max}(A + B) \leq \lambda_{\max}(A) + \lambda_{\max}(B)$. Hence,

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$$\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau})) \leq \lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau})) + \lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau})).$$

1296 Thus, $\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau})) \leq \lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau})) - \alpha$.
1297

1298 Since the spectral norm of a real symmetric matrix A is given as $\|A\|_{\sigma} = \max\{|\lambda_{\max}(A)|, |\lambda_{\min}(A)|\}$.
1299

1300 Under hessian heterogeneity assumption 4

$$\begin{aligned} 1301 \|\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau})\|_{\sigma} &= \max \{ |\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\theta, \tau) - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau))|, \\ 1302 &\quad |\lambda_{\min}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\theta, \tau) - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau))| \} \\ 1303 &\leq \rho_{\tau}^i. \\ 1304 \\ 1305 \end{aligned}$$

1306 Thus, we have

$$\begin{aligned} 1307 \lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau})) &\leq \max \left\{ \left| \lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau})) \right|, \right. \\ 1308 &\quad \left. \left| \lambda_{\min}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau})) \right| \right\} \\ 1309 &\leq \rho_{\tau}^i. \\ 1310 \\ 1311 \end{aligned}$$

1313 Thus, $\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau})) \leq \lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau})) - \alpha \leq \rho_{\tau}^i - \alpha$, where $\rho_{\tau}^i \geq 0$.
1314 Hence,

$$1315 \nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \preceq (\rho_{\tau}^i - \alpha) \mathbf{I}.$$

1316 When $\rho_{\tau}^i \leq \alpha$, then $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \preceq 0$.
1317

1318 Now, since $(\hat{\theta}, \hat{\tau})$ satisfy the equilibrium condition (40), thus $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau}) \prec 0$ and the Schur
1319 complement of $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\hat{\theta}, \hat{\tau})$ is positive semi-definite. Now when $\rho_{\tau}^i < \alpha$, it follows from above that
1320 $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}) \prec 0$, hence $(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau}))^{-1}$ exists. Now, we need to show that Schur complement of
1321 $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i(\hat{\theta}, \hat{\tau})$ is positive semi-definite.
1322

1323 Since, $S(\hat{\theta}, \hat{\tau}) := \left[\nabla_{\theta\theta}^2 U_{\tilde{\theta}} - \nabla_{\theta\tau}^2 U_{\tilde{\theta}} (\nabla_{\tau\tau}^2 U_{\tilde{\theta}})^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}} \right] (\hat{\theta}, \hat{\tau}) \succ 0$.
1325

1326 Define $S^i := \left[\nabla_{\theta\theta}^2 U_{\tilde{\theta}}^i - \nabla_{\theta\tau}^2 U_{\tilde{\theta}}^i (\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i \right]$. We aim to prove $\lambda_{\min}(S^i) \geq 0$ to show S^i
1327 is positive semidefinite (PSD).
1328

1329 Analogous to the above part, using corollary to Weyl's theorem, we have

$$1330 \lambda_{\min}(S^i - S) + \lambda_{\min}(S) \leq \lambda_{\min}(S^i).$$

1332 Let $\lambda_{\min}(S) = \beta$, where $\beta \geq 0$. Moreover, $\|S^i - S\|_{\sigma} = \max \{ |\lambda_{\max}(S^i - S)|, |\lambda_{\min}(S^i - S)| \}$,
1333 thus $\lambda_{\min}(S^i - S) \geq -\|S^i - S\|_{\sigma}$.

1334 Thus, we have

$$1335 -\|(S^i - S)\|_{\sigma} + \beta \leq \lambda_{\min}(S^i).$$

1336 We can write $S^i - S$ as

$$\begin{aligned} 1337 S^i - S &= (\nabla_{\theta\theta}^2 U_{\tilde{\theta}}^i - \nabla_{\theta\theta}^2 U_{\tilde{\theta}}) - \left[(\nabla_{\theta\tau}^2 U_{\tilde{\theta}}^i - \nabla_{\theta\tau}^2 U_{\tilde{\theta}}) (\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i \right. \\ 1338 &\quad \left. + \nabla_{\theta\tau}^2 U_{\tilde{\theta}} (\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} (\nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i - \nabla_{\tau\theta}^2 U_{\tilde{\theta}}) + \nabla_{\theta\tau}^2 U_{\tilde{\theta}} \left((\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} - (\nabla_{\tau\tau}^2 U_{\tilde{\theta}})^{-1} \right) \nabla_{\tau\theta}^2 U_{\tilde{\theta}} \right]. \\ 1339 \\ 1340 \end{aligned}$$

1341 Hence,

$$\begin{aligned} 1342 \|S^i - S\|_{\sigma} &\leq \|\nabla_{\theta\theta}^2 U_{\tilde{\theta}}^i - \nabla_{\theta\theta}^2 U_{\tilde{\theta}}\|_{\sigma} + \underbrace{\|(\nabla_{\theta\tau}^2 U_{\tilde{\theta}}^i - \nabla_{\theta\tau}^2 U_{\tilde{\theta}}) (\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i\|_{\sigma}}_{T_1} \\ 1343 &\quad + \underbrace{\|\nabla_{\theta\tau}^2 U_{\tilde{\theta}} (\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} (\nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i - \nabla_{\tau\theta}^2 U_{\tilde{\theta}})\|_{\sigma}}_{T_2} \\ 1344 &\quad + \underbrace{\|\nabla_{\theta\tau}^2 U_{\tilde{\theta}} \left((\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} - (\nabla_{\tau\tau}^2 U_{\tilde{\theta}})^{-1} \right) \nabla_{\tau\theta}^2 U_{\tilde{\theta}}\|_{\sigma}}_{T_3}. \\ 1345 \\ 1346 \\ 1347 \\ 1348 \\ 1349 \end{aligned}$$

1350 Note that the eigenvalue of $(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1}$ is $\lambda \left((\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} \right) = \frac{1}{\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)}$, hence $\|(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1}\|_{\sigma} =$
1351 $\frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)|}$ as $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i$ is negative definite. By Assumption 2, each client's function U^i is L -
1352 Lipschitz thus $\|\nabla^2 U_{\tilde{\theta}}^i\|_{\sigma} \leq L$. Since the Hessian $\nabla^2 U_{\tilde{\theta}}^i$ is a block matrix of the form:
1353

$$\nabla^2 U_{\tilde{\theta}}^i = \begin{bmatrix} \nabla_{\theta\theta}^2 U_{\tilde{\theta}}^i & \nabla_{\theta\tau}^2 U_{\tilde{\theta}}^i \\ \nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i & \nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i \end{bmatrix},$$

1354 The norm of Hessian is at least the norm of one of its components

$$1355 \|\nabla_{\theta\theta}^2 U_{\tilde{\theta}}^i\|_{\sigma} \leq L, \quad \|\nabla_{\theta\tau}^2 U_{\tilde{\theta}}^i\|_{\sigma} \leq L, \quad \|\nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i\|_{\sigma} \leq L, \quad \|\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i\|_{\sigma} \leq L.$$

1356 Thus, each Hessian block is individually bounded by L . Additionally, U is L -Lipschitz too. Using
1357 Assumption 4, bounding T_1

$$\begin{aligned} 1358 T_1 &= \|(\nabla_{\theta\tau}^2 U_{\tilde{\theta}}^i - \nabla_{\theta\tau}^2 U_{\tilde{\theta}})(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i\|_{\sigma} \\ 1359 &\leq \|(\nabla_{\theta\tau}^2 U_{\tilde{\theta}}^i - \nabla_{\theta\tau}^2 U_{\tilde{\theta}})\|_{\sigma} \cdot \|(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1}\|_{\sigma} \cdot \|\nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i\|_{\sigma} \\ 1360 &\leq L \rho_{\theta\tau}^i \frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)|} \end{aligned}$$

1361 Similarly, bounding T_2

$$\begin{aligned} 1362 T_2 &= \|\nabla_{\theta\tau}^2 U_{\tilde{\theta}}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1}(\nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i - \nabla_{\tau\theta}^2 U_{\tilde{\theta}})\|_{\sigma} \\ 1363 &\leq \|\nabla_{\theta\tau}^2 U_{\tilde{\theta}}\|_{\sigma} \cdot \|(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1}\|_{\sigma} \cdot \|(\nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i - \nabla_{\tau\theta}^2 U_{\tilde{\theta}})\|_{\sigma} \\ 1364 &\leq L \rho_{\tau\theta}^i \frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)|} \end{aligned}$$

1365 Lastly we bound T_3 , it is easy to verify that $\mathbf{A}^{-1} - \mathbf{B}^{-1} = \mathbf{A}^{-1}(\mathbf{B} - \mathbf{A})\mathbf{B}^{-1}$

$$\begin{aligned} 1366 T_3 &= \|\nabla_{\theta\tau}^2 U_{\tilde{\theta}} \left((\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} - (\nabla_{\tau\tau}^2 U_{\tilde{\theta}})^{-1} \right) \nabla_{\tau\theta}^2 U_{\tilde{\theta}}\|_{\sigma} \\ 1367 &\leq \|\nabla_{\theta\tau}^2 U_{\tilde{\theta}}\|_{\sigma} \cdot \|(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1} - (\nabla_{\tau\tau}^2 U_{\tilde{\theta}})^{-1}\|_{\sigma} \cdot \|\nabla_{\tau\theta}^2 U_{\tilde{\theta}}\|_{\sigma} \\ 1368 &= \|\nabla_{\theta\tau}^2 U_{\tilde{\theta}}\|_{\sigma} \cdot \|(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}} - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1}\|_{\sigma} \cdot \|\nabla_{\tau\theta}^2 U_{\tilde{\theta}}\|_{\sigma} \\ 1369 &\leq \|\nabla_{\theta\tau}^2 U_{\tilde{\theta}}\|_{\sigma} \cdot \|(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1}\|_{\sigma} \cdot \|\nabla_{\tau\tau}^2 U_{\tilde{\theta}} - \nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i\|_{\sigma} \cdot \|(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)^{-1}\|_{\sigma} \cdot \|\nabla_{\tau\theta}^2 U_{\tilde{\theta}}\|_{\sigma} \\ 1370 &\leq L^2 \rho_{\tau}^i \frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i) \cdot \lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}})|} \end{aligned}$$

1371 Using bounds for T_1 , T_2 and T_3 , we can obtain a bound on $\|S^i - S\|_{\sigma} \leq B^i$, where $B^i =$
1372 $\rho_{\theta}^i + L \rho_{\theta\tau}^i \frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)|} + L \rho_{\tau\theta}^i \frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)|} + L^2 \rho_{\tau}^i \frac{1}{|\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i) \cdot \lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}})|}$. Consider $\rho^i =$
1373 $\max\{\rho_{\theta}^i, \rho_{\theta\tau}^i, \rho_{\tau\theta}^i, \rho_{\tau}^i\}$. Hence, $B^i \leq \rho^i \left(1 + \frac{L}{\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i)} \left(2 + \frac{1}{\lambda_{\max}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}})} \right) \right)$. Hence, we
1374 obtain

$$1375 \lambda_{\min}(S^i) \geq -B^i + \beta,$$

1376 where $\lambda_{\max}(S) = \beta$ such that $\beta \geq 0$. Hence, we obtain
1377 $\left[\nabla_{\theta\theta}^2 U_{\tilde{\theta}}^i - \nabla_{\theta\tau}^2 U_{\tilde{\theta}}^i \left(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i \right)^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i \right] (\hat{\theta}, \hat{\tau}) \succeq (\beta - B^i)I$. When $\beta \geq B^i$, then S^i is
1378 positive semi-definite. When $B^i = 0$, hence $\left[\nabla_{\theta\theta}^2 U_{\tilde{\theta}}^i - \nabla_{\theta\tau}^2 U_{\tilde{\theta}}^i \left(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}^i \right)^{-1} \nabla_{\tau\theta}^2 U_{\tilde{\theta}}^i \right] (\hat{\theta}, \hat{\tau}) \succeq \beta I$,
1379 thus it will be positive semidefinite. When $\rho_{\tau}^i < \alpha$ and $\beta > B^i$, then the sufficient condition for
1380 ε^i -approximate equilibrium is satisfied. And we obtain the result.

1381 Thus, for each client i , any approximation error ε^i that satisfies:

$$1382 \max\{\zeta_{\theta}^i, \zeta_{\tau}^i\} \leq \varepsilon^i \leq \min\{\alpha - \rho_{\tau}^i, \beta - B^i\}.$$

1383 for $\rho_{\tau}^i < \alpha$ and $B^i > \beta$, then $(\hat{\theta}, \hat{\tau})$ is an ε^i -approximate local equilibrium point for client i . \square

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- 1404 B.3 CONSISTENCY
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 1406 B.3.1 ASSUMPTIONS
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 1408 We first state the assumptions that are necessary to establish the consistency of the estimated parameter.
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 1410 **Assumption 6** (Identification). θ_0 is the unique $\theta \in \Theta$ such that $\psi(f^i; \theta) = 0$ for all $f^i \in \mathcal{F}$, where
 1411 $i \in [n]$.
 1412
 1413 **Assumption 7** (Absolutely Star Shaped). For every $f^i \in \mathcal{F}^i$ and $|c| \leq 1$, we have $cf^i \in \mathcal{F}^i$.
 1414
 1415 **Assumption 8** (Continuity). For any x , $g^i(x; \theta)$, $f^i(x; \tau)$ are continuous in θ and τ , respectively for
 1416 all $i \in [N]$.
 1417
 1418 **Assumption 9** (Boundedness). Y^i , $\sup_{\theta \in \Theta} |g^i(X; \theta)|$, $\sup_{\tau \in \mathcal{T}} |f^i(Z; \tau)|$ are bounded random
 1419 variables for all $i \in [N]$.
 1420
 1421 **Assumption 10** (Bounded Complexity). \mathcal{F}^i and \mathcal{G}^i have bounded Rademacher complexities:
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 1423
$$\frac{1}{2^{n_i}} \sum_{\xi_i \in \{-1, +1\}^{n_i}} \mathbb{E} \sup_{\tau \in \mathcal{T}} \frac{1}{n_i} \sum_{k=1}^{n_i} \xi_i f^i(Z_k; \tau) \rightarrow 0, \quad \frac{1}{2^{n_i}} \sum_{\xi_i \in \{-1, +1\}^{n_i}} \mathbb{E} \sup_{\theta \in \Theta} \frac{1}{n_i} \sum_{k=1}^{n_i} \xi_i g^i(X_k; \theta) \rightarrow 0.$$

 1424
 1425 B.3.2 PROOF OF THEOREM 2
 1426
 1427 **Theorem 6** (Restatement of Theorem 2). *Let $\tilde{\theta}_n$ be a data-dependent choice for the federated objective that has a limit in probability. For each client $i \in [N]$, define $m^i(\theta, \tau, \tilde{\theta}) := f^i(Z^i; \tau)(Y^i - g(X^i; \theta)) - \frac{1}{4}f^i(Z^i; \tau)^2(Y^i - g(X^i; \tilde{\theta}))^2$, $M^i(\theta) = \sup_{\tau \in \mathcal{T}} \mathbb{E}[m^i(\theta, \tau, \tilde{\theta})]$ and $\eta^i(\epsilon) := \inf_{d(\theta, \theta_0) \geq \epsilon} M^i(\theta) - M^i(\theta_0)$ for every $\epsilon > 0$. Let $(\hat{\theta}_n, \hat{\tau}_n)$ be a solution that satisfies the approximate equilibrium for each of the client $i \in [N]$ as*
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 1429
 1430
 1431
 1432
 1433
$$\sup_{\tau \in \mathcal{T}} U_{\tilde{\theta}}^i(\hat{\theta}_n, \tau) - \varepsilon^i - o_p(1) \leq U_{\tilde{\theta}}^i(\hat{\theta}_n, \hat{\tau}_n) \leq \inf_{\theta \in \Theta} \max_{\tau: \|\tau - \hat{\tau}_n\| \leq h(\delta)} U_{\tilde{\theta}}^i(\theta, \tau) + \varepsilon^i + o_p(1),$$

 1434
 1435
 1436 for some δ_0 , such that for any $\delta \in (0, \delta_0]$, and any θ, τ such that $\|\theta - \hat{\theta}\| \leq \delta$ and $\|\tau - \hat{\tau}\| \leq \delta$ and
 1437 a function $h(\delta) \rightarrow 0$ as $\delta \rightarrow 0$. Then, under similar assumptions as in Assumptions 1 to 5 of (Bennett
 1438 et al., 2019), the global solution $\hat{\theta}_n$ is a consistent estimator to the true parameter θ_0 , i.e. $\hat{\theta}_n \xrightarrow{p} \theta_0$
 1439 when the approximate error $\varepsilon^i < \frac{\eta^i(\epsilon)}{2}$ for every $\epsilon > 0$ for each client $i \in [N]$.
 1440
 1441
 1442
 1443
 1444 *Proof.* The proof follows from the result of Bennett et al. (2019) that established the consistency of
 1445 the DEEPGMM estimator.
 1446
 1447 First, we define the following terms for the ease of analysis:
 1448
 1449
$$m^i(\theta, \tau, \tilde{\theta}) = f^i(Z^i; \tau)(Y^i - g(X^i; \theta)) - \frac{1}{4}f^i(Z^i; \tau)^2(Y^i - g(X^i; \tilde{\theta}))^2$$

 1450
 1451
$$M^i(\theta) = \sup_{\tau \in \mathcal{T}} \mathbb{E}[m^i(\theta, \tau, \tilde{\theta})]$$

 1452
 1453
$$M_{n_i}(\theta) = \sup_{\tau \in \mathcal{T}} \mathbb{E}_{n_i} [m^i(\theta, \tau, \tilde{\theta}_n)]$$

 1454
 1455 Note that $\tilde{\theta}_n$ is a data-dependent sequence for the global model. Practically, the previous global
 1456 iterate is used as $\tilde{\theta}$. Thus, we can define for the federated setting $\tilde{\theta}_n = \frac{1}{N} \sum_{i=1}^N \tilde{\theta}_{n_i}$. Let's assume
 1457 $\tilde{\theta}_n \xrightarrow{p} \tilde{\theta}$.

1458 **Claim 1:** $\sup_{\theta} |M_{n_i}(\theta) - M^i(\theta)| \xrightarrow{p} 0$.

$$\begin{aligned}
1460 \sup_{\theta} |M_{n_i}(\theta) - M^i(\theta)| &= \sup_{\theta} \left| \sup_{\tau \in \mathcal{T}} \mathbb{E}_{n_i}[m^i(\theta, \tau, \tilde{\theta}_n)] - \sup_{\tau \in \mathcal{T}} \mathbb{E}[m^i(\theta, \tau, \tilde{\theta})] \right| \\
1461 &\leq \sup_{\theta, \tau} \left| \mathbb{E}_{n_i}[m^i(\theta, \tau, \tilde{\theta}_n)] - \mathbb{E}[m^i(\theta, \tau, \tilde{\theta})] \right| \\
1462 &\leq \sup_{\theta, \tau} \left| \mathbb{E}_{n_i}[m^i(\theta, \tau, \tilde{\theta}_n)] - \mathbb{E}[m^i(\theta, \tau, \tilde{\theta}_n)] \right| + \sup_{\theta, \tau} \left| \mathbb{E}[m^i(\theta, \tau, \tilde{\theta}_n)] - \mathbb{E}[m^i(\theta, \tau, \tilde{\theta})] \right| \\
1463 &\leq \sup_{\theta_1, \theta_2, \tau} \left| \mathbb{E}_{n_i}[m^i(\theta_1, \tau, \theta_2)] - \mathbb{E}[m^i(\theta_1, \tau, \theta_2)] \right| + \sup_{\theta, \tau} \left| \mathbb{E}[m^i(\theta, \tau, \tilde{\theta}_n)] - \mathbb{E}[m^i(\theta, \tau, \tilde{\theta})] \right| \\
1464 &\leq \sup_{\theta_1, \theta_2, \tau} \left| \mathbb{E}_{n_i}[m^i(\theta_1, \tau, \theta_2)] - \mathbb{E}[m^i(\theta_1, \tau, \theta_2)] \right| + \sup_{\theta, \tau} \left| \mathbb{E}[m^i(\theta, \tau, \tilde{\theta}_n)] - \mathbb{E}[m^i(\theta, \tau, \tilde{\theta})] \right|
\end{aligned}$$

1471 We will now handle the two terms in the above equation separately.

1472 We will take the first term and call it B_1 . For $m^i(\theta, \tau, \tilde{\theta}_n)$, we constitute its empirical counterpart
1473 $m_k^i(\theta, \tau, \tilde{\theta}_n) = f^i(Z_k^i; \tau)(Y_k^i - g^i(X_k^i; \theta)) - \frac{1}{4}f^i(Z_k^i; \tau)^2(Y_k^i - g^i(X_k^i; \tilde{\theta}))^2$ and using $m_k^i'(\theta, \tau, \tilde{\theta}_n')$
1474 with ghost variables $\tilde{\theta}_n'$ for symmetrization and ϵ_k as k i.i.d. Rademacher random variables, we
1475 obtain

$$\begin{aligned}
1476 \mathbb{E}[B_1] &= \mathbb{E} \left[\sup_{\theta_1, \theta_2, \tau} \left| \frac{1}{n_i} \sum_{k=1}^{n_i} m_k^i(\theta_1, \tau, \theta_2) - \mathbb{E}[m_k^i(\theta_1, \tau, \theta_2)] \right| \right] \\
1477 &\leq \mathbb{E} \left[\sup_{\theta_1, \theta_2, \tau} \left| \frac{1}{n_i} \sum_{k=1}^{n_i} (m_k^i(\theta_1, \tau, \theta_2) - m_k^i(\theta_1, \tau, \theta_2')) \right| \right] \\
1478 &\leq \mathbb{E} \left[\sup_{\theta_1, \theta_2, \tau} \left| \frac{1}{n_i} \sum_{k=1}^{n_i} \epsilon_k (m_k^i(\theta_1, \tau, \theta_2) - m_k^i(\theta_1, \tau, \theta_2')) \right| \right] \\
1479 &\leq 2\mathbb{E} \left[\sup_{\theta_1, \theta_2, \tau} \left| \frac{1}{n_i} \sum_{k=1}^{n_i} \epsilon_k m_k^i(\theta_1, \tau, \theta_2) \right| \right] \\
1480 &\leq 2\mathbb{E} \left[\sup_{\theta, \tau} \left| \frac{1}{n_i} \sum_{k=1}^{n_i} \epsilon_k f^i(Z_k^i; \tau)(Y_k^i - g^i(X_k^i; \theta)) \right| \right] \\
1481 &\quad + \frac{1}{2}\mathbb{E} \left[\sup_{\theta, \tau} \left| \frac{1}{n_i} \sum_{k=1}^{n_i} \epsilon_k f^i(Z_k^i; \tau)^2(Y_k^i - g^i(X_k^i; \tilde{\theta}))^2 \right| \right] \\
1482 &\leq 2\mathbb{E} \left[\sup_{\theta, \tau} \left| \frac{1}{n_i} \sum_{k=1}^{n_i} \epsilon_k \left(\frac{1}{2}f^i(Z_k^i; \tau)^2 + \frac{1}{2}(Y_k^i - g^i(X_k^i; \theta))^2 \right) \right| \right] \\
1483 &\quad + \frac{1}{2}\mathbb{E} \left[\sup_{\theta, \tau} \left| \frac{1}{n_i} \sum_{k=1}^{n_i} \epsilon_k \left(\frac{1}{2}f^i(Z_k^i; \tau)^4 + \frac{1}{2}(Y_k^i - g^i(X_k^i; \tilde{\theta}))^4 \right) \right| \right] \\
1484 &\leq \mathbb{E} \left[\sup_{\theta, \tau} \left| \frac{1}{n_i} \sum_{k=1}^{n_i} \epsilon_k f^i(Z_k^i; \tau)^2 \right| \right] + \mathbb{E} \left[\sup_{\theta, \tau} \left| \frac{1}{n_i} \sum_{k=1}^{n_i} \epsilon_k (Y_k^i - g^i(X_k^i; \theta))^2 \right| \right] \\
1485 &\quad + \frac{1}{4}\mathbb{E} \left[\sup_{\theta, \tau} \left| \frac{1}{n_i} \sum_{k=1}^{n_i} \epsilon_k f^i(Z_k^i; \tau)^4 \right| \right] + \frac{1}{4}\mathbb{E} \left[\sup_{\theta, \tau} \left| \frac{1}{n_i} \sum_{k=1}^{n_i} \epsilon_k (Y_k^i - g^i(X_k^i; \tilde{\theta}))^4 \right| \right]
\end{aligned}$$

1508 Using boundedness assumption 9, we consider the mapping from $f^i(Z_k^i; \tau)$ and $g^i(X_k^i; \tilde{\theta})$ to the
1509 summation terms in the last inequality as Lipschitz functions, hence for any functional class \mathcal{F}^i and
1510 L -Lipschitz function ϕ , $\mathcal{R}_{n_i}(\phi \circ f^i) \leq L\mathcal{R}_{n_i}(\mathcal{F}^i)$, where $\mathcal{R}_{n_i}(\mathcal{F}^i)$ is the Rademacher complexity
1511 of class \mathcal{F}^i . Hence, $\mathbb{E}[B_1] \leq L(\mathcal{R}_{n_i}(\mathcal{G}^i) + \mathcal{R}_{n_i}(\mathcal{F}^i))$. Using assumption 10, $\mathbb{E}[B_1] \rightarrow 0$. Let B'_1 be
a modified value of B_1 , after changing the j -th value of X^i, Z^i and Y^i values, using assumption 9 on

1512 boundedness, we obtain the bounded difference inequality:
1513

$$\begin{aligned} 1514 \sup_{X_{1:n_i}, Z_{1:n_i}, Y_{1:n_i}, X'_j, Z'_j, Y'_j} |B_1 - B'_1| &\leq \sup_{\theta_1, \theta_2, \tau, X_{1:n_i}, Z_{1:n_i}, Y_{1:n_i}, X'_j, Z'_j, Y'_j} \left| \frac{1}{n_i} (m_j^i(\theta_1, \tau, \theta_2) - m_j^{i\prime}(\theta_1, \tau, \theta_2)) \right| \\ 1516 &\leq \frac{b}{n_i}, \\ 1517 \end{aligned}$$

1518 where b is some constant. Using McDiarmid's Inequality, we have $P(|B_1 - \mathbb{E}[B_1]| \geq \epsilon_0) \leq$
1519 $2 \exp\left(\frac{-2n_i \epsilon_0^2}{c^2}\right)$. And $\mathbb{E}[B_1] \rightarrow 0$, we have $B_1 \xrightarrow{p} 0$.
1520

1521 Now, we will handle B_2 . For that

$$\begin{aligned} 1522 B_2 &= \sup_{\theta, \tau} \left| \mathbb{E} \left[m^i(\theta, \tau, \tilde{\theta}_n) \right] - \mathbb{E} \left[m^i(\theta, \tau, \tilde{\theta}) \right] \right| \\ 1523 &= \sup_{\theta, \tau} \left| \mathbb{E} \left[f^i(Z^i; \tau)(Y^i - g(X^i; \theta)) - \frac{1}{4} f^i(Z^i; \tau)^2 (Y^i - g(X^i; \tilde{\theta}_n))^2 \right] \right. \\ 1524 &\quad \left. - \mathbb{E} \left[f^i(Z^i; \tau)(Y^i - g(X^i; \theta)) - \frac{1}{4} f^i(Z^i; \tau)^2 (Y^i - g(X^i; \tilde{\theta}))^2 \right] \right| \\ 1525 &= \sup_{\theta, \tau} \frac{1}{4} \left| \mathbb{E} \left[f^i(Z^i; \tau)^2 (Y^i - g(X^i; \tilde{\theta}_n))^2 \right] - \mathbb{E} \left[f^i(Z^i; \tau)^2 (Y^i - g(X^i; \tilde{\theta}))^2 \right] \right| \\ 1526 &= \sup_{\theta, \tau} \frac{1}{4} \left| \mathbb{E} \left[f^i(Z^i; \tau)^2 (Y^i - g(X^i; \tilde{\theta}_n))^2 \right] + \mathbb{E} \left[f^i(Z^i; \tau)^2 (Y^i - g(X^i; \tilde{\theta}))^2 \right] \right. \\ 1527 &\quad \left. - \mathbb{E} \left[f^i(Z^i; \tau)^2 (Y^i - g(X^i; \tilde{\theta}))^2 \right] - \mathbb{E} \left[f^i(Z^i; \tau)^2 (Y^i - g(X^i; \tilde{\theta}))^2 \right] \right| \\ 1528 &\leq \frac{1}{4} \sup_{\tau} \left| \mathbb{E} \left[f^i(Z^i; \tau)^2 \omega_n \right] \right| \\ 1529 \\ 1530 \end{aligned}$$

1531 Here, $\omega_n = \left| (Y^i - g(X^i; \tilde{\theta}_n))^2 - (Y^i - g(X^i; \tilde{\theta}))^2 \right|$. Due to our assumption, $\tilde{\theta}_n \xrightarrow{p} \tilde{\theta}$, thus $\omega_n \xrightarrow{p} 0$
1532 due to Slutsky's and continuous mapping theorem. Since, $f^i(Z; \tau)$ is uniformly bounded, thus for
1533 some constant $b' > 0$, we have

$$\begin{aligned} 1534 B_2 &\leq \frac{b'}{4} \sup_{\tau} \frac{1}{N} \sum_{i=1}^N |\mathbb{E}[\omega_n]| \\ 1535 &\leq \frac{b'}{4} \sup_{\tau} \frac{1}{N} \sum_{i=1}^N \mathbb{E}[|\omega_n|] \\ 1536 \end{aligned}$$

1537 Based on the boundedness assumption, we can verify that ω_n is bounded, hence using Lebesgue
1538 Dominated Convergence Theorem, we can conclude that $\mathbb{E}[|\omega_n|] \rightarrow 0$.
1539

1540 Thus, using the convergence of B_1 and B_2 , we have $\sup_{\theta} |M_{n_i}(\theta) - M^i(\theta)| \xrightarrow{p} 0$ for each $i \in [N]$.
1541

1542 **Claim 2:** for every $\epsilon > 0$, we have $\inf_{d(\theta, \theta_0) \geq \epsilon} M^i(\theta) > M^i(\theta_0)$.
1543

1544 $M^i(\theta_0)$ is the unique minimizer of $M^i(\theta)$. By assumption (6) and (7), θ_0 is the unique minimizer
1545 of $\sup_{\tau} \mathbb{E}[f^i(Z^i; \tau)(Y^i - g^i(X; \theta))]$ such that $\sup_{\tau} \mathbb{E}[f^i(Z^i; \tau)(Y^i - g^i(X; \theta))] = 0$. Thus, any
1546 other value of θ will have at least one τ such that this expectation is strictly positive. $M(\theta_0) = 0$ and
1547 $M(\theta_0) = \sup_{\tau} -\frac{1}{4} f^i(Z^i; \tau)^2 (Y^i - g^i(X; \theta))^2$, the function whose supremum is being evaluated
1548 is non-positive but can be set to zero by assumption (7) by taking the zero function of f^i . Let for
1549 any other $\theta' \neq \theta_0$, let $f^{i\prime}$ be a function in \mathcal{F}^i such that $\mathbb{E}[f^{i\prime}(Z^i)(Y^i - g^i(X; \theta'))] > 0$. If we have
1550 $\mathbb{E}[f^{i\prime}(Z^i)^2 (Y^i - g^i(X; \tilde{\theta}))^2] = 0$, then $M^i(\theta') > 0$. Else, consider $cf^{i\prime}$ for any $c \in (0, 1)$. Using
1551 assumption (7), $cf^{i\prime} \in \mathcal{F}^i$, thus

$$\begin{aligned} 1552 M^i(\theta') &= \sup_{f^i \in \mathcal{F}^i} \mathbb{E} \left[f^i(Z^i)(Y^i - g(X^i; \theta')) - \frac{1}{4} f^i(Z^i)^2 (Y^i - g(X^i; \tilde{\theta}))^2 \right] \\ 1553 &\leq c \mathbb{E} \left[f^{i\prime}(Z^i)(Y^i - g(X^i; \theta')) \right] - \frac{c^2}{4} \mathbb{E} \left[f^{i\prime}(Z^i)^2 (Y^i - g(X^i; \tilde{\theta}))^2 \right] \\ 1554 \end{aligned}$$

1566 This is quadratic in c and is positive when c is sufficiently small, thus $M^i(\theta') > 0$.
1567

1568 We now prove claim 2 using contradiction. Let us assume claim 2 is false, i.e. for some $\epsilon > 0$,
1569 we have $\inf_{\theta \in B(\theta_0, \epsilon)} M^i(\theta) = M^i(\theta_0)$, where $B(\theta_0, \epsilon)^c = \{\theta \mid d(\theta, \theta_0) \geq \epsilon\}$, since θ_0 is the
1570 unique minimizer of $M^i(\theta)$ by assumption (6). Thus, there must exist some sequence $(\theta_1, \theta_2, \dots)$ in
1571 $B(\theta_0, \epsilon)^c$ such that $M^i(\theta_n) \rightarrow M^i(\theta_0)$. By construction, $B(\theta_0, \epsilon)^c$ is closed and the corresponding
1572 limit parameters $\theta^* = \lim_{n \rightarrow \infty} \theta_n \in B(\theta_0, \epsilon)^c$ must satisfy $M^i(\theta^*) = M^i(\theta_0)$ using assumption (8).
1573 But $d(\theta^*, \theta_0) \geq \epsilon > 0$, thus $\theta^* \neq \theta_0$. This contradicts that θ_0 is the unique minimizer of $M^i(\theta)$;
1574 hence, claim 2 is true.

1575 **Claim 3:** For the third part, we know that $\hat{\theta}_n$ satisfies the ε^i - approximate equilibrium condition,
1576 given as:

$$1578 \mathbb{E}_{n_i}[m^i(\hat{\theta}_n, \tau, \tilde{\theta}_n)] - \varepsilon^i \leq \mathbb{E}_{n_i}[m^i(\hat{\theta}_n, \hat{\tau}_n, \tilde{\theta}_n)] \leq \max_{\tau' : \|\tau' - \hat{\tau}_n\| \leq h(\delta)} \mathbb{E}_{n_i}[m^i(\theta, \tau', \tilde{\theta}_n)] + \varepsilon^i,$$

1581 for a function $h(\delta) \rightarrow 0$ as $\delta \rightarrow 0$ and some δ_0 , such that for any $\delta \in (0, \delta_0]$, and any θ, τ such that
1582 $\|\theta - \hat{\theta}\| \leq \delta$ and $\|\tau - \hat{\tau}\| \leq \delta$. Assume that this is true with $o_p(1)$, hence

$$1584 \sup_{\tau} \mathbb{E}_{n_i}[m^i(\hat{\theta}_n, \tau, \tilde{\theta}_n)] - \varepsilon^i - o_p(1) \leq \mathbb{E}_{n_i}[m^i(\hat{\theta}_n, \hat{\tau}_n, \tilde{\theta}_n)] \leq \inf_{\theta} \max_{\tau' : \|\tau' - \hat{\tau}_n\| \leq h(\delta)} \mathbb{E}_{n_i}[m^i(\theta, \tau', \tilde{\theta}_n)] + \varepsilon^i + o_p(1),$$

1586 Now, since $M_{n_i}(\hat{\theta}_n) = \sup_{\tau} \mathbb{E}_{n_i}[m^i(\hat{\theta}_n, \tau, \tilde{\theta}_n)]$. Hence,

$$1588 \inf_{\theta} \max_{\tau' : \|\tau' - \hat{\tau}_n\| \leq h(\delta)} \mathbb{E}_{n_i}[m^i(\theta, \tau', \tilde{\theta}_n)] \leq \inf_{\theta} \sup_{\tau} \mathbb{E}_{n_i}[m^i(\theta, \tau', \tilde{\theta}_n)] = \inf_{\theta} M_{n_i}(\theta) \leq M_{n_i}(\theta_0)$$

1590 Thus, we have

$$1592 M_{n_i}(\hat{\theta}_n) - \varepsilon^i - o_p(1) \leq \mathbb{E}_{n_i}[m^i(\hat{\theta}_n, \hat{\tau}_n, \tilde{\theta}_n)] \leq M_{n_i}(\theta_0) + \varepsilon^i + o_p(1).$$

1593 We have proven all three conditions until now. From the first and second condition, since $|M_{n_i}(\theta_0) -$
1594 $M^i(\theta_0)| \xrightarrow{p} 0$, hence $M_{n_i}(\hat{\theta}_n) \leq M^i(\theta_0) + 2\varepsilon^i + o_p(1)$. Hence, we obtain

$$1596 M^i(\hat{\theta}_n) - M^i(\theta_0) \leq M^i(\hat{\theta}_n) - M_{n_i}(\hat{\theta}_n) + 2\varepsilon^i + o_p(1) \\ 1597 \leq \sup_{\theta} |M^i(\hat{\theta}) - M_{n_i}(\hat{\theta})| + 2\varepsilon^i + o_p(1) \\ 1599 \leq 2\varepsilon^i + o_p(1)$$

1601 Hence, we obtain

$$1603 M^i(\hat{\theta}_n) - M^i(\theta_0) - 2\varepsilon^i \leq M^i(\hat{\theta}_n) - M_{n_i}(\hat{\theta}_n) + o_p(1) \\ 1604 \leq \sup_{\theta} |M^i(\hat{\theta}) - M_{n_i}(\hat{\theta})| + o_p(1) \\ 1606 \leq o_p(1)$$

1608 Since, let $\eta^i(\epsilon) := \inf_{d(\theta, \theta_0) \geq \epsilon} M^i(\theta) - M^i(\theta_0)$. Hence, whenever $d(\hat{\theta}_n, \theta_0) \geq \epsilon$, we have $M^i(\hat{\theta}_n) -$
1609 $M^i(\theta_0) \geq \eta^i(\epsilon)$. Thus, $\mathbb{P}[d(\hat{\theta}_n, \theta_0) \geq \epsilon] \leq \mathbb{P}[M^i(\hat{\theta}_n) - M^i(\theta_0) \geq \eta^i(\epsilon)] = \mathbb{P}[M^i(\hat{\theta}_n) - M^i(\theta_0) -$
1610 $2\varepsilon^i \geq \eta^i(\epsilon) - 2\varepsilon^i]$. For every $\epsilon > 0$, we have $\eta^i(\epsilon) > 0$ from claim 2, and $M^i(\hat{\theta}_n) - M^i(\theta_0) - 2\varepsilon^i =$
1611 $o_p(1)$. Thus, $\eta^i(\epsilon) - 2\varepsilon^i > 0$ when $\varepsilon^i < \frac{\eta^i(\epsilon)}{2}$. We have that for every $\epsilon > 0$ and $\varepsilon^i < \frac{\eta^i(\epsilon)}{2}$, the
1612 RHS probability converges to 0, thus $d(\hat{\theta}_n, \theta_0) = o_p(1)$, hence $\hat{\theta}_n$ converges in probability to θ_0 for
1613 each client $i \in [N]$.
1614

□

1617 C LIMIT POINTS OF FEDGDA

1618 We first discuss the γ -FEDGDA flow.
1619

1620 C.1 FEDGDA FLOW
1621

1622 The FEDGDA updates can be written as
1623

$$\begin{aligned}
1624 \quad \theta_{t+1} &= \theta_t - \eta \frac{1}{\gamma} \frac{1}{N} \sum_{i \in [N]} \sum_{r=1}^R (\nabla_{\theta} U_{\tilde{\theta}}(\theta_t, \tau_t) + (\nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) - \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_t, \tau_t)) \\
1625 &\quad + (\nabla_{\theta} U_{\tilde{\theta}}^i(\theta_t, \tau_t) - \nabla_{\theta} U_{\tilde{\theta}}(\theta_t, \tau_t))) \\
1626 \\
1627 \quad \tau_{t+1} &= \tau_t + \eta \frac{1}{N} \sum_{i \in [N]} \sum_{r=1}^R (\nabla_{\tau} U_{\tilde{\theta}}(\theta_t, \tau_t) + (\nabla_{\tau} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) - \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_t, \tau_t)) \\
1628 &\quad + (\nabla_{\tau} U_{\tilde{\theta}}^i(\theta_t, \tau_t) - \nabla_{\tau} U_{\tilde{\theta}}(\theta_t, \tau_t)))
\end{aligned}$$

1633 Rearranging the terms and taking the continuous-time limit as $\eta \rightarrow 0$
1634

$$\begin{aligned}
1635 \quad \lim_{\eta \rightarrow 0} \frac{\theta_{t+1} - \theta_t}{\eta} &= \lim_{\eta \rightarrow 0} -\frac{1}{\gamma} \frac{1}{N} \sum_{i \in [N]} \sum_{r=1}^R (\nabla_{\theta} U_{\tilde{\theta}}(\theta_t, \tau_t) + (\nabla_{\theta} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) - \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_t, \tau_t)) \\
1636 &\quad + (\nabla_{\theta} U_{\tilde{\theta}}^i(\theta_t, \tau_t) - \nabla_{\theta} U_{\tilde{\theta}}(\theta_t, \tau_t))) \\
1637 \\
1638 \quad \lim_{\eta \rightarrow 0} \frac{\tau_{t+1} - \tau_t}{\eta} &= \lim_{\eta \rightarrow 0} \frac{1}{N} \sum_{i \in [N]} \sum_{r=1}^R (\nabla_{\tau} U_{\tilde{\theta}}(\theta_t, \tau_t) + (\nabla_{\tau} U_{\tilde{\theta}}^i(\theta_{t,r}^i, \tau_{t,r}^i) - \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_t, \tau_t)) \\
1639 &\quad + (\nabla_{\tau} U_{\tilde{\theta}}^i(\theta_t, \tau_t) - \nabla_{\tau} U_{\tilde{\theta}}(\theta_t, \tau_t)))
\end{aligned}$$

1644 We obtain the gradient flow equations as
1645

$$\begin{aligned}
1646 \quad \frac{d\theta}{dt} &= -\frac{R}{\gamma} \frac{1}{N} \sum_{i \in [N]} (\nabla_{\theta} U_{\tilde{\theta}}(\theta(t), \tau(t))) - \frac{R}{\gamma} \frac{1}{N} \sum_{i \in [N]} (\nabla_{\theta} U_{\tilde{\theta}}^i(\theta^i(t), \tau^i(t)) - \nabla_{\theta} U_{\tilde{\theta}}^i(\theta(t), \tau(t))) \\
1647 &\quad - \frac{R}{\gamma} \frac{1}{N} \sum_{i \in [N]} (\nabla_{\theta} U_{\tilde{\theta}}^i(\theta(t), \tau(t)) - \nabla_{\theta} U_{\tilde{\theta}}(\theta(t), \tau(t))), \tag{41}
\end{aligned}$$

$$\begin{aligned}
1652 \quad \frac{d\tau}{dt} &= R \frac{1}{N} \sum_{i \in [N]} (\nabla_{\tau} U_{\tilde{\theta}}(\theta(t), \tau(t))) + R \frac{1}{N} \sum_{i \in [N]} (\nabla_{\tau} U_{\tilde{\theta}}^i(\theta^i(t), \tau^i(t)) - \nabla_{\tau} U_{\tilde{\theta}}^i(\theta(t), \tau(t))) \\
1653 &\quad + R \frac{1}{N} \sum_{i \in [N]} (\nabla_{\tau} U_{\tilde{\theta}}^i(\theta(t), \tau(t)) - \nabla_{\tau} U_{\tilde{\theta}}(\theta(t), \tau(t))). \tag{42}
\end{aligned}$$

1658 Using Assumption 3
1659

$$\begin{aligned}
1660 \quad \left\| \frac{R}{\gamma} \frac{1}{N} \sum_{i \in [N]} (\nabla_{\theta} U_{\tilde{\theta}}^i(\theta(t), \tau(t)) - \nabla_{\theta} U_{\tilde{\theta}}(\theta(t), \tau(t))) \right\| &\leq \frac{R}{\gamma} \zeta_{\theta} \\
1661 \\
1663 \quad \left\| R \frac{1}{N} \sum_{i \in [N]} (\nabla_{\tau} U_{\tilde{\theta}}^i(\theta(t), \tau(t)) - \nabla_{\tau} U_{\tilde{\theta}}(\theta(t), \tau(t))) \right\| &\leq R \zeta_{\tau}
\end{aligned}$$

1667 Thus,
1668

$$\begin{aligned}
1669 \quad \frac{R}{\gamma} \frac{1}{N} \sum_{i \in [N]} (\nabla_{\theta} U_{\tilde{\theta}}^i(\theta(t), \tau(t)) - \nabla_{\theta} U_{\tilde{\theta}}(\theta(t), \tau(t))) &= \mathcal{O}\left(\frac{R}{\gamma} \zeta_{\theta}\right) \\
1670 \\
1672 \quad R \frac{1}{N} \sum_{i \in [N]} (\nabla_{\tau} U_{\tilde{\theta}}^i(\theta(t), \tau(t)) - \nabla_{\tau} U_{\tilde{\theta}}(\theta(t), \tau(t))) &= \mathcal{O}(R \zeta_{\tau})
\end{aligned}$$

1674 Since $U_{\tilde{\theta}}^i$ is Lipschitz smooth by assumption 2, we have
1675

$$1676 \left\| \frac{R}{\gamma} \frac{1}{N} \sum_{i \in [N]} (\nabla_{\theta} U_{\tilde{\theta}}^i(\theta^i(t), \tau^i(t)) - \nabla_{\theta} U_{\tilde{\theta}}^i(\theta(t), \tau(t))) \right\| \leq L \frac{R}{\gamma} \frac{1}{N} \sum_{i \in [N]} \|(\theta^i(t), \tau^i(t)) - (\theta(t), \tau(t))\|,$$

$$1677 \left\| R \frac{1}{N} \sum_{i \in [N]} (\nabla_{\tau} U_{\tilde{\theta}}^i(\theta^i(t), \tau^i(t)) - \nabla_{\tau} U_{\tilde{\theta}}^i(\theta(t), \tau(t))) \right\| \leq LR \frac{1}{N} \sum_{i \in [N]} \|(\theta^i(t), \tau^i(t)) - (\theta(t), \tau(t))\|.$$

$$1678$$

$$1679$$

$$1680$$

$$1681$$

$$1682$$

1683 Substituting these bounds into Equations (41) and (42), we obtain
1684

$$1685$$

$$1686 \frac{R}{\gamma} \frac{1}{N} \sum_{i \in [N]} (\nabla_{\theta} U_{\tilde{\theta}}^i(\theta^i(t), \tau^i(t)) - \nabla_{\theta} U_{\tilde{\theta}}^i(\theta, \tau)) = \mathcal{O} \left(L \frac{R}{\gamma} \frac{1}{N} \sum_{i \in [N]} \|(\theta^i(t), \tau^i(t)) - (\theta(t), \tau(t))\| \right),$$

$$1687$$

$$1688$$

$$1689$$

$$1690 R \frac{1}{N} \sum_{i \in [N]} (\nabla_{\tau} U_{\tilde{\theta}}^i(\theta^i(t), \tau^i(t)) - \nabla_{\tau} U_{\tilde{\theta}}^i(\theta, \tau)) = \mathcal{O} \left(LR \frac{1}{N} \sum_{i \in [N]} \|(\theta^i(t), \tau^i(t)) - (\theta(t), \tau(t))\| \right).$$

$$1691$$

$$1692$$

1693 Since the local update follows
1694

$$1695$$

$$1696 \theta^i(t) = \theta(t) - \frac{\eta}{\gamma} \sum_{j=1}^R \nabla_{\theta} U_{\tilde{\theta}}^i(\theta_j^i(t), \tau_j^i(t)),$$

$$1697$$

$$1698$$

$$1699 \tau^i(t) = \tau(t) + \eta \sum_{j=1}^R \nabla_{\tau} U_{\tilde{\theta}}^i(\theta_j^i(t), \tau_j^i(t)),$$

$$1700$$

$$1701$$

$$1702$$

1703 Using bounded gradient assumption, i.e. $\|\nabla_{\theta} U_{\tilde{\theta}}^i(\theta, \tau)\|^2 \leq G_{\theta}$ and $\|\nabla_{\tau} U_{\tilde{\theta}}^i(\theta, \tau)\|^2 \leq G_{\tau}$ for all i ,
1704 as $\eta \rightarrow 0$ and R is fixed and finite, the deviation $\|(\theta^i(t), \tau^i(t)) - (\theta(t), \tau(t))\|$ vanish, leading to
1705

$$1706 \frac{d\theta}{dt} = -\frac{1}{\gamma} R \nabla_{\theta} U_{\tilde{\theta}}(\theta(t), \tau(t)) + \mathcal{O} \left(\frac{R}{\gamma} \zeta_{\theta} \right),$$

$$1707$$

$$1708 \frac{d\tau}{dt} = R \nabla_{\tau} U_{\tilde{\theta}}(\theta(t), \tau(t)) + \mathcal{O}(R \zeta_{\tau}).$$

$$1709$$

$$1710$$

$$1711$$

1712 C.1.1 PROOF OF PROPOSITION 1

1713 **Proposition** (Restatement of Proposition 1). *Given the Jacobian matrix for γ -FEDGDA flow as*

$$1714 \mathbf{J} = \begin{pmatrix} -\frac{1}{\gamma} R \nabla_{\theta\theta}^2 U_{\tilde{\theta}}(\theta, \tau) & -\frac{1}{\gamma} R \nabla_{\theta\tau}^2 U_{\tilde{\theta}}(\theta, \tau) \\ R \nabla_{\tau\theta}^2 U_{\tilde{\theta}}(\theta, \tau) & R \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau) \end{pmatrix},$$

$$1715$$

$$1716$$

$$1717$$

$$1718$$

1719 *a point (θ, τ) is a strictly linearly stable equilibrium of the γ -FEDGDA flow if and only if the real
1720 parts of all eigenvalues of \mathbf{J} are negative, i.e., $\text{Re}(\Lambda_j) < 0$ for all j .*

1721 *Proof.* Considering the FEDGDA dynamics with step size η , the Jacobian matrix of this dynamic
1722 system is $\mathbf{I} + \eta \mathbf{J}$. The eigenvalues of \mathbf{J} are Λ_j , thus the eigenvalues of $\mathbf{I} + \eta \mathbf{J}$ are $\{1 + \eta \Lambda_j\}$.
1723

1724 By definition, a fixed point \mathbf{z}^* of a dynamical system \mathbf{w} , such that $\mathbf{z}^* = \mathbf{w}(\mathbf{z}^*)$, is a strict linearly
1725 stable point if the spectral radius $\rho(\mathbf{J}(\mathbf{z}^*)) < 1$, where \mathbf{J} is the Jacobian matrix of \mathbf{w} . Therefore,
1726 (θ, τ) is a strict linearly stable point if and only if $\rho(\mathbf{I} + \eta \mathbf{J}) < 1$, that is $|1 + \eta \Lambda_j| < 1$ for all j .
1727 When taking $\eta \rightarrow 0$, this is equivalent to $\text{Re}(\Lambda_j) < 0$ for all j . \square

1728 C.2 PROOF OF THEOREM 3
1729

1730 *Proof.* Let $\mathbf{A} = \nabla_{\theta\theta}^2 U_{\tilde{\theta}}(\theta, \tau)$, $\mathbf{B} = \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau)$ and $\mathbf{C} = \nabla_{\theta\tau}^2 U_{\tilde{\theta}}(\theta, \tau)$. Consider $\epsilon = \frac{1}{\gamma}$, thus for
1731 sufficiently small ϵ (hence a large γ), the Jacobian \mathbf{J} of FEDGDA for a point (θ, τ) is given as:
1732

1733
$$\mathbf{J}_\epsilon = R \begin{pmatrix} -\epsilon \mathbf{A} & -\epsilon \mathbf{C} \\ \mathbf{C}^\top & \mathbf{B} \end{pmatrix}.$$

1734

1735 Using Lemma 9, \mathbf{J}_ϵ has $d_1 + d_2$ complex eigenvalues $\{\Lambda_j\}_{j=1}^{d_1+d_2}$ such that
1736

1737
$$\begin{aligned} |\Lambda_j + \epsilon \mu_j| &= o(\epsilon) & 1 \leq j \leq d_1 \\ |\Lambda_{j+d_1} - \nu_j| &= o(1), & 1 \leq j \leq d_2, \end{aligned} \quad (43)$$

1738

1739 where $\{\mu_j\}_{j=1}^{d_1}$ and $\{\nu_j\}_{j=1}^{d_2}$ are the eigenvalues of matrices $R(\mathbf{A} - \mathbf{C}\mathbf{B}^{-1}\mathbf{C}^\top)$ and $R\mathbf{B}$ respectively.
1740

1741 We now prove the theorem statement:
1742

1743
$$\text{LocMinimax} \subset \overline{\infty - \mathcal{FGDA}} \subset \overline{\infty - \mathcal{FGDA}} \subset \text{LocMinimax} \cup$$

1744
$$\{(\theta, \tau) | (\theta, \tau) \text{ is stationary and } \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau) \text{ is degenerate}\}.$$

1745

1746 By definition of \limsup and \liminf , we know that $\overline{\infty - \mathcal{FGDA}} \subset \overline{\infty - \mathcal{FGDA}}$.
1747

1748 Now we show $\text{LocMinimax} \subset \overline{\infty - \mathcal{FGDA}}$. Consider a strict local minimax point (θ, τ) , then by
1749 sufficient condition it follows that:
1750

$$\mathbf{B} \prec 0, \quad \text{and} \quad \mathbf{A} - \mathbf{C}\mathbf{B}^{-1}\mathbf{C}^\top \succ 0.$$

1751 Thus, $R\mathbf{B} \prec 0$, and $R(\mathbf{A} - \mathbf{C}\mathbf{B}^{-1}\mathbf{C}^\top) \succ 0$, where R is always positive. Hence, $\{\nu_j\}_{j=1}^{d_1} < 0$ and
1752 $\{\mu_j\}_{j=1}^{d_2} < 0$. Using equations 43, for some small $\epsilon_0 < \epsilon$, $\text{Re}(\Lambda_j) < 0$ for all j . Thus, (θ, τ) is a
1753 strict linearly stable point of $\frac{1}{\epsilon}$ -FEDGDA.
1754

1755 Now, we show $\overline{\infty - \mathcal{FGDA}} \subset \text{LocMinimax} \cup \{(\theta, \tau) | (\theta, \tau) \text{ is stationary and } \nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau) \text{ is degenerate}\}.$
1756 Consider (θ, τ) a strict linearly stable point of $\frac{1}{\epsilon}$ -FEDGDA, such that for some small ϵ ,
1757 $\text{Re}(\Lambda_j) < 0$ for all j . By equation 43, assuming \mathbf{B}^{-1} exists
1758

$$R\mathbf{B} \prec 0, \quad \text{and} \quad R(\mathbf{A} - \mathbf{C}\mathbf{B}^{-1}\mathbf{C}^\top) \succeq 0.$$

1759 Since, R is positive, thus $\mathbf{B} \prec 0$, and $\mathbf{A} - \mathbf{C}\mathbf{B}^{-1}\mathbf{C}^\top \succeq 0$. Let's assume $\mathbf{A} - \mathbf{C}\mathbf{B}^{-1}\mathbf{C}^\top$ has 0 as
1760 an eigenvalue. Thus, there exists a unit eigenvector \mathbf{w} such that $\mathbf{A} - \mathbf{C}\mathbf{B}^{-1}\mathbf{C}^\top \mathbf{w} = 0$. Then,
1761

1762
$$\mathbf{J}_\epsilon \cdot (\mathbf{w}, -\mathbf{B}^{-1}\mathbf{C}^\top \mathbf{w})^\top = R \begin{pmatrix} -\epsilon \mathbf{A} & -\epsilon \mathbf{C} \\ \mathbf{C}^\top & \mathbf{B} \end{pmatrix} \cdot \begin{pmatrix} \mathbf{w} \\ -\mathbf{B}^{-1}\mathbf{C}^\top \mathbf{w} \end{pmatrix} = \mathbf{0}.$$

1763

1764 Thus, \mathbf{J}_ϵ has 0 as its eigenvalue, which is a contradiction because for strict linearly stable point
1765 $\text{Re}(\Lambda_j) < 0$ for all j . Thus, $\mathbf{A} - \mathbf{C}\mathbf{B}^{-1}\mathbf{C}^\top \succ 0$. Hence, (θ, τ) is a strict local minimax point.
1766

1767 Let $G : \mathbb{R}^d \times \mathbb{R}^k \rightarrow \mathbb{R}$ be the function defined as: $G(\theta, \tau) = \det(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau))$. Let's assume that
1768 $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau)$ is smooth, thus the determinant function is a polynomial in the entries of the Hessian,
1769 which implies that G is a smooth function. Since $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau) = 0$ implies at least one eigenvalue of
1770 $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau)$ is zero, thus $\det(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau)) = 0$.
1771

1772 We aim to show that the set
1773

1774
$$\mathcal{A} = \{(\theta, \tau) \mid (\theta, \tau) \text{ is stationary and } \det(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau)) = 0\}$$

1775

1776 has measure zero in $\mathbb{R}^d \times \mathbb{R}^k$.
1777

1778 A point $q \in \mathbb{R}^d \times \mathbb{R}^k$ is a *regular value* of G if for every $(\theta, \tau) \in G^{-1}(q)$, the differential $dG(\theta, \tau)$
1779 is surjective. Otherwise, q is a *critical value*.
1780

1781 The differential of G is given by: $\nabla G(\theta, \tau) = \text{Tr}(\text{Adj}(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}) \cdot \nabla(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}))$. If
1782 $\det(\nabla_{\tau\tau}^2 U_{\tilde{\theta}}(\theta, \tau)) = 0$, then the Hessian $\nabla_{\tau\tau}^2 U_{\tilde{\theta}}$ is singular. This causes its adjugate matrix to
1783 lose rank, leading to a degeneracy in $\nabla G(\theta, \tau)$, making $dG(\theta, \tau)$ not surjective.
1784

1782 Thus, every (θ, τ) satisfying $G(\theta, \tau) = 0$ is a critical point of G , meaning that 0 is a *critical value* of
 1783 G .

1784 By Sard's theorem, the set of critical values of a smooth function has measure zero in the codomain.
 1785 Since G is smooth, the set of critical values of G in \mathbb{R} has measure zero. In particular, since 0 is a
 1786 critical value of G , the set: $G^{-1}(0) = \{(\theta, \tau) \mid \det(\nabla_{\tau\tau}^2 U_{\bar{\theta}}(\theta, \tau)) = 0\}$ has measure zero in \mathbb{R}^{d+k} .
 1787

1788 Since the set of degenerate $\nabla_{\tau\tau}^2 U_{\bar{\theta}}(\theta, \tau)$ is precisely $G^{-1}(0)$, we conclude that
 1789 Lebesgue measure(\mathcal{A}) = 0. Thus, the set of stationary points where the Hessian $\nabla_{\tau\tau}^2 U_{\bar{\theta}}(\theta, \tau)$ is
 1790 singular has measure zero in $\mathbb{R}^d \times \mathbb{R}^k$. \square

1791 **Lemma 8.** (Zedek, 1965) *Given a polynomial $p_n(z) := \sum_{k=0}^n a_k z^k$, where $a_n \neq 0$, an integer
 1792 $m \geq n$ and a number $\epsilon > 0$, there exists a number $\delta > 0$ such that whenever the $m+1$ complex
 1793 numbers b_k , $0 \leq k \leq m$, satisfy the inequalities*

$$1795 |b_k - a_k| < \delta \quad \text{for } 0 \leq k \leq n, \quad \text{and} \quad |b_k| < \delta \quad \text{for } n+1 \leq k \leq m,$$

1796 then the roots β_k , $1 \leq k \leq m$, of the polynomial $q_m(z) := \sum_{k=0}^m b_k z^k$ can be labeled in such a way
 1797 as to satisfy, with respect to the zeros α_k , $1 \leq k \leq n$, of $p_n(z)$, the inequalities

$$1799 |\beta_k - \alpha_k| < \epsilon \quad \text{for } 1 \leq k \leq n, \quad \text{and} \quad |\beta_k| > 1/\epsilon \quad \text{for } n+1 \leq k \leq m.$$

1800 **Lemma 9.** *For any symmetric matrix $\mathbf{A} \in \mathbb{R}^{d_1 \times d_1}$, $\mathbf{B} \in \mathbb{R}^{d_2 \times d_2}$, any rectangular matrix $\mathbf{C} \in$
 1801 $\mathbb{R}^{d_1 \times d_2}$ and a scalar R , assume that \mathbf{B} is non-degenerate. Then, matrix*

$$1803 R \begin{pmatrix} -\epsilon \mathbf{A} & -\epsilon \mathbf{C} \\ \mathbf{C}^\top & \mathbf{B} \end{pmatrix}$$

1805 has $d_1 + d_2$ complex eigenvalues $\{\Lambda_j\}_{j=1}^{d_1+d_2}$ with following form for sufficiently small ϵ :

$$1807 |\Lambda_j + \epsilon \mu_j| = o(\epsilon) \quad 1 \leq j \leq d_1 \\ 1808 |\Lambda_{j+d_1} - \nu_j| = o(1), \quad 1 \leq j \leq d_2,$$

1809 where $\{\frac{1}{R} \mu_j\}_{j=1}^{d_1}$ and $\{\frac{1}{R} \nu_j\}_{j=1}^{d_2}$ are the eigenvalues of matrices $\mathbf{A} - \mathbf{C} \mathbf{B}^{-1} \mathbf{C}^\top$ and \mathbf{B} respectively.

1810 The proof follows from Lemma 8 by a similar argument as in (Jin et al., 2020) with $\{\mu_j\}_{j=1}^{d_1}$
 1811 and $\{\nu_j\}_{j=1}^{d_2}$ as the eigenvalues of matrices $R(\mathbf{A} - \mathbf{C} \mathbf{B}^{-1} \mathbf{C}^\top)$ and $R\mathbf{B}$, respectively, and is thus
 1812 omitted.

1816 D RELATED WORK

1818 The federated supervised learning has received algorithmic advancements guided by factors such as
 1819 tackling the system and statistical heterogeneities, better sample and communication complexities,
 1820 model personalization, differential privacy, etc. An incomplete list includes FEDPROX (Li et al.,
 1821 2020), SCAFFOLD (Karimireddy et al., 2020), FEDOPT (Reddi et al., 2020), LPP-SGD (Chatterjee
 1822 et al., 2024), pFEDME (T Dinh et al., 2020), DP-SCAFFOLD (Noble et al., 2022), and others.

1823 By contrast, federated learning with confounders in a causal learning setting is a relatively under-
 1824 explored research area. Vo et al. (2022a) presented a method to learn the similarities among the data
 1825 sources translating a structural causal model (Pearl, 2009) to federated setting. They transform the loss
 1826 function by utilizing Random Fourier Features into components associated with the clients. Thereby
 1827 they compute individual treatment effects (ITE) and average treatment effects (ATE) by a federated
 1828 maximization of evidence lower bound (ELBO). Vo et al. (2022b) presented another federated
 1829 Bayesian method to estimate the posterior distributions of the ITE and ATE using a non-parametric
 1830 approach.

1831 Xiong et al. (2023) presented maximum likelihood estimator (MLE) computation in a federated
 1832 setting for ATE estimation. They showed that the federated MLE consistently estimates the ATE
 1833 parameters considering the combined data across clients. However, it is not clear if this approach is
 1834 applicable to consistent local moment conditions estimation for the participating clients. Almodóvar
 1835 et al. (2024) applied FedAvg to variational autoencoder (Kingma et al., 2019) based treatment effect
 estimation TEDVAE (Zhang et al., 2021). However, their work mainly focused on comparing the

1836 performance of vanilla FedAvg with a propensity score-weighted FedAvg in the context of federated
1837 implementation of TEDVAE.

1838 Our work differs from the above related works in the following:

- 1840 (a) we introduce IV analysis in federated setting, and, we introduce federated GMM estimators,
1841 which has applications for various empirical research (Wooldridge, 2001),
- 1842 (b) specifically, we adopt a non-Bayesian approach based on a federated zero-sum game, wherein
1843 we focus on analysing the dynamics of the federated minimax optimization and characterize the
1844 global equilibria as a consistent estimator of the clients' moment conditions.

1845 Our work also differs from federated minimax optimization algorithms: Sharma et al. (2022); Shen
1846 et al. (2024); Wu et al. (2024); Zhu et al. (2024), where the motivation is to analyse and improve the
1847 non-asymptotic convergence under various analytical assumptions on the objective functions. We
1848 primarily focus on deriving the equilibrium via the limit points of the federated GDA algorithm.

1850 E BENCHMARK CONSIDERATIONS AND ADDITIONAL EXPERIMENTS

1852 E.1 THE EXPERIMENTAL BENCHMARK DESIGN

1854 As stated, our experiments take the Bennett et al. (2019)'s experiments as a centralized-setting
1855 baseline. Therefore, we have used the same synthetic dataset as DEEPGMM, which they use in their
1856 experiments to benchmarks against the baselines therein such as DEEPIV (Hartford et al., 2017). It is
1857 standard to perform experimental analysis on synthetic datasets for unavailability of ground truth
1858 for causal inference; for example see Section 4.1.1 of Vo et al. (2022b). As the learning process
1859 essentially involves estimating the true parameter θ_0 by $\hat{\theta}$, to measure the performance of the learning
1860 procedure, we use the MSE of the estimate $\hat{g} := g(\cdot, \hat{\theta})$ against the true g_0 averaged over the clients.
1861 Nonetheless, an experimental comparison of our work with recent works on federated Bayesian
1862 methods for causal effect estimations does not apply directly. We discuss that below.

1863 The two works in the domain of federated Bayesian methods for causal effect estimations are
1864 CAUSALRFF (Vo et al., 2022a) and FEDCI (Vo et al., 2022b). The aim of CAUSALRFF (Vo et al.,
1865 2022a) is to estimate the conditional average treatment effect (CATE) and average treatment effect
1866 (ATE), whereas FEDCI (Vo et al., 2022b) aims to estimate individual treatment effect (ITE) and
1867 ATE. For this, (Vo et al., 2022a) consider a setting of Y , W , and X to be random variables denoting
1868 the outcome, treatment, and proxy variable, respectively. Along with that, they also consider a
1869 confounding variable Z . However, their causal dependency builds on the dependence of each of Y ,
1870 W , and X on Z besides dependency of Y on W . Consequently, to compute CATE and ATE, they
1871 need to estimate the conditional probabilities $p(w^i|x^i)$, $p(y^i|x^i, w^i)$, $p(z^i|x^i, y^i, w^i)$, $p(y^i|w^i, z^i)$,
1872 where the superscript i represents a client. Their experiments compare the estimates of CATE and
1873 ATE with the Bayesian baselines (Hill, 2011), (Shalit et al., 2017), (Louizos et al., 2017), etc. in
1874 a centralized setting without any consideration of data decentralization or heterogeneity native to
1875 federated learning. Further, they compare against the same baselines in a *one-shot federated* setting,
1876 where at the end of training on separate data sources independently, the predicted treatment effects
1877 are averaged. Similar is the experimental evaluation of (Vo et al., 2022b). **Similarly, Xiong et al.**
1878 **(2023) address a fundamentally different causal setting from ours, as they target ATE/ATT estimation**
1879 **in observational studies under the unconfoundedness assumption ($\{Y(0), Y(1)\} \perp\!\!\!\perp W | X$), which**
1880 **implies that treatment assignment W is exogenous given observed covariates X .**

1881 By contrast, the setting of IV analysis as in our work does not consider dependency of the outcome
1882 variable Y on the confounder Z , though the treatment variable X could be endogenous and depend on
1883 Z . **In our synthetic data generation, an unobserved confounder explicitly enters both the treatment and**
1884 **outcome equations, inducing correlation between (X) and the residual ($Y - g_0(X)$) and therefore**
1885 **violating unconfoundedness by construction.** For us, computing the treatment effects and thereby
1886 comparing it against these works is not direct. Furthermore, it is unclear, if the approach of (Vo
1887 et al., 2022a) and (Vo et al., 2022b), where the predicted inference over a number of datasets is
1888 averaged as the final result, would be comparable to our approach where the problem is solved
1889 using a federated maximin optimization with multiple synchronization rounds among the clients.
For us, the federated optimization subsumes the experimental of comparing the average predicted
values after independent training with the predicted value over the entire data. This is the reason that

our centralized counterpart i.e. DEEPGMM (Bennett et al., 2019), do not experimentally compare against the baselines of (Vo et al., 2022a) and (Vo et al., 2022b). In summary, for us the experimental benchmarks were guided by showing the efficient fit of the GMM estimator in a federated setting.

E.2 ADDITIONAL EXPERIMENTS

Estimations	$Dir_S(\alpha) = 0.1$		$Dir_S(\alpha) = 1.0$	
	FDEEPGMM-GDA	FDEEPGMM-SGDA	FDEEPGMM-GDA	FDEEPGMM-SGDA
FEMNIST_x	0.27 ± 0.04	0.23 ± 0.02	0.17 ± 0.01	0.19 ± 0.03
FEMNIST_{x,z}	0.21 ± 0.01	0.24 ± 0.04	0.16 ± 0.03	0.18 ± 0.02
FEMNIST_z	0.29 ± 0.02	0.25 ± 0.03	0.20 ± 0.04	0.23 ± 0.01
CIFAR10_x	0.26 ± 0.01	0.27 ± 0.01	0.18 ± 0.01	0.15 ± 0.02
CIFAR10_{x,z}	0.29 ± 0.02	0.30 ± 0.01	0.21 ± 0.02	0.13 ± 0.01
CIFAR10_z	1.73 ± 0.01	0.67 ± 0.02	0.37 ± 0.05	0.35 ± 0.02

Table 2: The averaged Test MSE with standard deviation in the high-dimensional scenarios with varying levels of heterogeneity.

The experimental results included in Section 4 were conducted setting $Dir_S(\alpha) = 0.3$, which corresponds to the case wherein a dataset with 10 classes, such as MNIST and CIFAR10, samples of 3 classes on average will be distributed to each client (Hsu et al., 2019). To further investigate the effect of heterogeneity on the performance of FEDDEEPGMM, we conducted experiments with $Dir_S(\alpha) = 0.1$ and $Dir_S(\alpha) = 1$. $Dir_S(\alpha) = 0.1$ would correspond to the case when every client would have samples from one class on average from a dataset with 10 classes, which represents a high heterogeneity setting. Whereas, setting $Dir_S(\alpha) = 1$, the data distribution across clients with regards to samples from different classes becomes roughly uniform representing a near homogeneous scenario. The experimental results are presented in Table 2.

The results presented in Table 2 indicate that on decreasing $Dir_S(\alpha)$ from 0.3 to 0.1, i.e. increasing heterogeneity, the Test MSE achieved increases marginally. Whereas, on increasing $Dir_S(\alpha)$ from 0.3 to 1.0, i.e. decreasing heterogeneity, the Test MSE achieved decreases. This set of observations corroborate our theoretical insight that the consistency of the GMM estimator depends on the heterogeneity bias. The change in the MSE values being only marginal can be attributed to the overparametrized setting offered by the CNN on a small-sized data on each client as well as hyperparameter tuning.