Regret Bounds for Risk-sensitive Reinforcement Learning with Lipschitz Dynamic Risk Measures

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Abstract

We study finite episodic Markov decision processes incorporating dynamic risk measures to capture risk sensitivity. To this end, we present two model-based algorithms applied to *Lipschitz* dynamic risk measures, a wide range of risk measures that subsumes spectral risk measure, optimized certainty equivalent. and distortion risk measures, among others. We establish both regret upper bounds and lower bounds. Notably, our upper bounds demonstrate optimal dependencies on the number of actions and episodes while reflecting the inherent trade-off between risk sensitivity and sample complexity. Our approach offers a unified framework that not only encompasses multiple existing formulations in the literature but also broadens the application spectrum.

1 INTRODUCTION

Standard reinforcement learning (RL) aims to identify an optimal policy that maximizes the expected return Sutton and Barto (2018). This approach is commonly known as risk-neutral RL since it prioritizes the mean value of the uncertain return. However, in domains characterized by high stakes scenarios, such as finance (Davis and Lleo, 2008; Bielecki et al., 2000), medical treatment (Ernst et al., 2006), and operations research (Delage and Mannor, 2010), decision-makers exhibit risk-sensitive behavior and strive to optimize a risk measure associated with the return. For example, in the field of finance, investors have different risk appetites and their investment decisions should consider risk factors such as market volatility, potential losses, and downside risks. Using risk-sensitive reinforcement learning, portfolio managers can optimize their investment strategies by balancing risk and return to meet their clients' risk preferences.

One classical framework that addresses risk sensitivity in Markov decision processes (MDPs) is the *static risk measure*. In this framework, the value of a policy is defined as a risk measure applied to the cumulative reward at all stages. Among the commonly used static risk measures are the entropic risk measure (ERM) (Howard and Matheson, 1972; Föllmer and Knispel, 2011) and the conditional value at risk (CVaR) (Rockafellar et al., 2000), along with several others. However, except for the ERM, the static risk measure generally does not satisfy the Bellman equation. Consequently, obtaining the optimal policy becomes computationally challenging, even when the MDP model is known.

As an extension of the static risk measure, the *dynamic* risk measure (DRM) (Ruszczyński, 2010) is constructed by recursively applying the risk measure to the reward at each stage. This recursive formulation naturally allows for the derivation of a dynamic programming equation and thus circumvents the computational burden. Furthermore, DRMs have the advantage of producing time-consistent optimal policies, a property that is particularly justified in financial applications (Osogami, 2012). Therefore, DRMs provide a more robust framework for decision-making in safety-critical applications, such as clinical treatment, where risk sensitivity at all stages is of paramount importance (Du et al., 2023).

Our work studies risk-sensitive reinforcement learning (RSRL) with a general DRM in the tabular and episodic MDP setting, in which the agent interacts with an unknown MDP with finite states and actions in an episodic manner. Central to our methodology is a foundational assumption: the risk measure in use exhibits Lipschitz continuity, aligned to a specific metric. This Lipschitz risk measure not only generalizes but also augments prior studies on RSRL with regret bounds. Some of the notable works in this domain include risk-neutral RL (Azar et al., 2017), RSRL with ERM (Fei et al., 2020, 2021a,b), RSRL with dynamic

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CVaR (Du et al., 2023), dynamic optimized certainty equivalent (OCE) (Xu et al., 2023). These risk measures belong to coherent or concave categories. Yet, the scope of Lipschitz risk measures extends beyond these. Several fields such as operations research, control theory, and behavioral economics employ even broader risk measures. To shed light on a few:

- behavioral economics. The prevailing assumption in coherent/concave measures is that agents demonstrate economic rationality, inherently skewing towards risk aversion, which often restricts its applicability in behavioral economics. Here, agents may not always be risk-averse, warranting more encompassing risk measures as highlighted by Chateauneuf and Cohen (2008); Tversky and Kahneman (1992). Our framework extends concave risk measures to incorporate those recognized in behavioral economics.
- operation research. Jiang and Powell (2016) applies a convex combination of expectation and CVaR to address the electric vehicle charging problem. Bäuerle and Glauner (2021) explores distortion risk measures and their applications in areas such as stopping problems, casino games, and cash balance management.

Whereas prior studies are tailored to particular risk measure classes, our approach offers a unified framework that not only encompasses multiple episodic RL formulations found in the literature but also broadens the application spectrum.

Challenges Leveraging Lipschitz risk measures presents unique technical challenges. One notable challenge emerges during the algorithmic design phase, especially when designing exploration bonuses for general nonlinear risk measures. Traditional methods, such as the Hoeffding inequality or Bernstein-type concentration bounds, primarily cater to the concentration of mean values, making them less suitable for our context. To navigate this, previous research, like Du et al. (2023) and Xu et al. (2023), tailors exploration bonuses according to the specific properties of the risk measures under examination. For example, Du et al. (2023) adopts a CVaR-specific classical concentration bound to determine the exploration bonus for dynamic CVaR. Conversely, Xu et al. (2023) exploits the optimization representation of OCE and uses the the concavity of the utility function for bonus construction. In our approach, the Lipschitz continuity of the risk measure allows us to link the value difference to the supremum distance. Subsequently, we employ the Dvoretzky-Kiefer-Wolfowitz (DKW) inequality (Massart, 1990) to bound the deviation between a given distribution and its empirical counterpart.

A second challenge arises when attempting to determine the suboptimality gap's recursion across different stages in our regret upper bounds proof. In a risk-neutral setting, the standard analysis draws upon the linearity of the mean for this recursion. However, such a direct adaptation is incompatible in a risk-sensitive context. Our solution is twofold: Firstly, the Lipschitz continuity is used to link the difference in values to the Wasserstein distance of two probability distributions. Next, we employ a transport inequality to bound the Wasserstein distance between two probability mass functions that share the same probability mass but vary in support. By incorporating the Lipschitz property, we derive a recursion for the suboptimality gap, with the Lipschitz constant serving as a scaling factor. Overcoming these challenges enables us to develop efficient algorithms and establish regret upper bounds.

Main Contributions We summarize our main contributions as follows:

1. We propose two model-based algorithms for RSRL with Lipschitz DRM. These algorithms incorporate the principle of optimism in the face of uncertainty (OFU) in different ways to facilitate efficient learning. To the best of our knowledge, this is the first work that investigates RSRL using general DRM without making the simulator assumption.

2. We provide worst-case and gap-dependent regret upper bounds for the proposed algorithms. Notably, the regret bounds are optimal in terms of the number of actions (A), and the number of episodes (K). They are dependent on the Lipschitz constants of the risk measures at all stages, capturing the inherent trade-off between risk sensitivity and sample complexity.

3. We establish the minimax and gap-dependent lower bounds for episodic MDPs with a general DRM. These lower bounds are tight in terms of A, K, and the number of states. Moreover, they reveal a constant factor that depends on the specific risk measure employed.

1.1 Related Work

RSRL without Regret Bounds. General DRM applied to MDP is presented in Ruszczyński (2010); Shen et al. (2013); Chu and Zhang (2014); Asienkiewicz and Jaśkiewicz (2017); Bäuerle and Glauner (2022). However, these works typically assume that the model of the MDP is known, whereas our paper focuses on studying regret guarantees for RSRL in the presence of an unknown MDP. While some research, such as Coache and Jaimungal (2021); Coache et al. (2022), explore RSRL with dynamic convex risk measures and dynamic spectral risk measures, these studies do not provide regret guarantees.

Regret Bounds for RSRL with Static Risk Measures Fei et al. (2020) provide the first regret bound for risk-sensitive tabular MDPs using the ERM. This result is further improved upon by Fei et al. (2021a), where they remove the exponential factor dependence on the episode length. Fei and Xu (2022) present the first gap-dependent regret bounds under this framework. Liang and Luo (2022) propose distributional reinforcement learning algorithms for RSRL with ERM, matching the results obtained in Fei et al. (2021a). Bastani et al. (2022) consider RSRL with the objective of spectral risk measure. Furthermore, Wang et al. (2023) improve upon the regret bound obtained in Bastani et al. (2022) in terms of the number of states and episode length. Ding et al. (2023) focuses on nonstationary RSRL based on entropic risk measure, which proposes a meta-algorithm with regret guarantees as well as regret lower bounds. A direct comparison between our work and the aforementioned studies is not feasible, as they operate within distinct contexts.

Regret Bounds for RSRL with DRMs Du et al. (2023) provides the first regret bound for RSRL using DRMs, specifically focusing on dynamic CVaR. Xu et al. (2023) investigates RSRL through the lens of dynamic OCE, a class of risk measures that encompasses several well-known measures, including ERM, CVaR, and mean-variance. Their research introduced a UCB-based value iteration algorithm, offering both regret upper bounds and a minimax lower bound. Lam et al. (2023) focuses on dynamic coherent risk measures in the context of non-linear function approximation. They propose an algorithm that leverages UCB-based value functions with nonlinear function approximation and prove a sublinear regret upper bound. Their work assumes the access to a weak simulator, which allows for generating an arbitrary number of next states from any given state. It remains unclear whether such assumptions can be removed in the tabular setting.

Our work contributes to this branch of literature. In contrast to Lam et al. (2023), our work does not rely on specific assumptions about the risk measure estimator or concentration bounds. Additionally, our approach considers a broader class of DRMs by focusing on Lipschitz DRMs, which encompasses a wider range of risk measures compared to coherent ones.

Connections to Robust MDPs Risk-sensitive MDPs and robust MDPs have garnered significant attention in the field of sequential decision-making under uncertainty. Risk-sensitive MDPs optimize risk-aware objective functions, such as entropic risk measures or CVaR, instead of the traditional expected reward criterion. Robust MDPs (Iyengar, 2005; Wiesemann et al., 2013), on the other hand, aim to optimize the

worst-case performance over a set of plausible MDPs, providing robustness against model misspecification or adversarial environments. Recent works have explored the connections between risk-sensitive and robust MDPs (Chow et al., 2015; Zhang et al., 2023), as well as their extensions to partially observable Bäuerle and Ott (2011) settings. These frameworks have found applications in domains where accounting for risk and uncertainty is crucial, such as finance, robotics, and cyber-security.

Our paper is organized as follows. We first introduce some background and problem formulations in Section 2. We then propose our algorithms in Section 3, which is followed by our main results in Section 4. The numerical experiments are shown in Section 5. Finally, we conclude our paper in Section 6.

2 PRELIMINARIES

Notations. We write $[N] := \{1, 2, ..., N\}$ for any positive integers N. We use $\mathbb{I}\{\cdot\}$ to denote the indicator function. We denote by $a \lor b := \max\{a, b\}$. We use the notation $\tilde{\mathcal{O}}(\cdot)$ to represent $\mathcal{O}(\cdot)$ with logarithmic factors omitted. For two real numbers a < b, the notation $\mathscr{D}([a, b])$ refers to the space of all probability distributions that are bounded over the interval [a, b]. For a discrete set $x = \{x_1, \cdots, x_n\}$ and a probability vector $P = (P_1, \cdots, P_n)$, the notation (x, P) represents the discrete distribution where $\mathbb{P}(X = x_i) = P_i$.

Static Risk Measure. A (static) risk measure quantifies the risk associated with a random outcome. It is a mapping $\rho : \mathscr{X} \to \mathbb{R}$ that assigns a real number to each random variable in the set \mathscr{X} , which satisfies certain properties of the following.

- monotonicity: $X \preceq Y \Rightarrow \rho(X) \le \rho(Y)$,
- translation-invariance: $\rho(X+c) = \rho(X)+c, \ c \in \mathbb{R},$
- super-additivity: $\rho(X+Y) \ge \rho(X) + \rho(Y)$,
- positive homogeneity: $\rho(\alpha X) = \alpha \rho(X)$ for $\alpha \ge 0$
- concavity: $\rho(\alpha X + (1-\alpha)Y) \ge \alpha \rho(X) + (1-\alpha)\rho(Y)$
- law-invariance: $F_X = F_Y \Rightarrow \rho(X) = \rho(Y)$.

Two intrinsic properties of risk measures are monotonicity and translation-invariance. *Coherent* risk measures, introduced by Artzner et al. (1999), are a widely used class of risk measures that satisfy super-additivity and positive homogeneity in addition. Coherent risk measures capture important concepts such as diversification and risk pooling. *Concave* risk measures generalize coherent risk measures by relaxing the requirements of super-additivity and positive homogeneity to concavity. Concave risk measures are more flexible and can capture a wider range of risk preferences.

Lipschitz risk measures (Bhat and LA, 2019; Liang and Luo, 2023), on the other hand, form an even broader class of risk measures, which encompass both coherent and concave risk measures. They allow for more general functional forms and provide a flexible framework for capturing risk in various settings. Lipschitz risk measures satisfy the law-invariance property, therefore we overload notations and write $\rho(F_X) := \rho(X)$ for $X \sim F_X$.

Lipschitz Continuity. For two cumulative distribution functions (CDFs) F and G, their supremum distance is defined as

$$||F - G||_{\infty} \triangleq \sup_{x \in \mathbb{R}} |F(x) - G(x)|.$$

For two distributions F, G over the reals, the Wasserstein distance between them coincides with their ℓ_1 distance (Bhat and LA, 2019)

$$W_1(F,G) = ||F - G||_1 \triangleq \int_{-\infty}^{\infty} |F(x) - G(x)| \, dx.$$

A risk measure ρ is said to be Lipschitz continuous with respect to a distance $\|\cdot\|_p$ $(p = 1 \text{ or } p = \infty)$ on the set of distributions $\mathscr{D}([a, b])$ if

$$\rho(F) - \rho(G) \le L_p(\rho, [a, b]) \left\| F - G \right\|_p, \forall F, G \in \mathscr{D}([a, b])$$

Here, $L_p(\rho, [a, b])$ is the Lipschitz constant associated with the risk measure ρ over the interval [a, b], and represents the maximum rate of change of the risk measure with respect to the distance metric. The Lipschitz continuity property provides a way to quantify the sensitivity of the risk measure to changes in the underlying distributions. A larger Lipschitz constant indicates a greater sensitivity or variability of the risk measure values with respect to changes in the distributions.

To gain some intuition, we present the Lipschitz constant values for several popular risk measures over the range [0, M] in Table 1. OCE encompasses both CVaR and ERM. Meanwhile, the distortion risk measure (DisRM) comprises the proportional hazard (PH) and lookback (LB) measures. For interested readers, please refer to Appendix B for the formal definitions of the risk measures and more detailed discussions about the Lipschitz constants.

Episodic MDP. An episodic MDP is defined by a tuple $\mathcal{M} \triangleq (\mathcal{S}, \mathcal{A}, (P_h)_{h \in [H]}, (r_h)_{h \in [H]}, H)$, where \mathcal{S} is the finite state space with cardinality $S \triangleq |\mathcal{S}|, \mathcal{A}$ the finite action space with cardinality $A \triangleq |\mathcal{A}|, P_h$: $S \times \mathcal{A} \times S \rightarrow [0, 1]$ the probability transition kernel at step $h, r_h : S \times \mathcal{A} \rightarrow [0, 1]$ the reward functions at step h, and H the length of one episode. The agent interacts with the environment for K episodes. At the beginning of episode k, an initial state s_1^k is arbitrarily selected. In step h, the agent takes action a_h^k based on the state s_h^k , according to its policy. The policy is represented by a deterministic sequence of functions $\pi = (\pi_h)_{h \in [H]}$, where each π_h maps from S to \mathcal{A} . The agent observes the reward $r_h(s_h^k, a_h^k)$ and transitions to the next state $s_{h+1}^k \sim P_h(\cdot|s_h^k, a_h^k)$. The episode terminates at H + 1, after which the agent proceeds to the next episode.

Dynamic Programming with DRM. The dynamic risk measure is defined via a recursive application of static risk measures $(\rho_h)_{h \in [H-1]}$ (Ruszczyński, 2010). The risk-sensitive value function of a policy π at step h is defined recursively

$$Q_h^{\pi}(s_h, a_h) = r_h(s_h, a_h) + \rho_h(V_{h+1}^{\pi}(s_{h+1}))$$

$$V_h^{\pi}(s_h) = Q_h^{\pi}(s_h, \pi_h(s_h)), V_{H+1}^{\pi}(s_{H+1}) = 0.$$
(1)

where ρ_h is taken over the *next-state value* $V_{h+1}^{\pi}(s_{h+1})$, i.e.,

$$V_{h+1}^{\pi}(s_{h+1}) \sim \left(V_{h+1}^{\pi}, P_h(s, a)\right) \Longrightarrow$$
$$\rho_h(V_{h+1}^{\pi}(s_{h+1})) = \rho_h\left(\left(V_{h+1}^{\pi}, P_h(s, a)\right)\right).$$

We refer to the distribution of $V_{h+1}^{\pi}(s_{h+1})$ as the *(next-state) value distribution* $(V_{h+1}^{\pi}, P_h(s, a))$. For convenience, we write $\rho(x, P) = \rho((x, P))$, thus we write $\rho_h (V_{h+1}^{\pi}, P_h(s, a))$. By incorporating the risk measure ρ_h into the recursive formulation, the dynamic risk measure framework provides a way to account for risk preferences and evaluate the risk-sensitive value function of a policy at each time step. When the risk measure ρ_h specializes in the mean (i.e., taking the expectation), Equation 1 reduces to the standard Bellman equation.

The (risk-sensitive) optimal policy is defined as the policy that maximizes the value function, i.e., $\pi^* = \arg \max_{\pi} V_1^{\pi}$. Consequently, the optimal value function is defined as $V_h^*(s) = V_h^{\pi^*}(s)$ and $Q_h^*(s, a) = Q_h^{\pi^*}(s, a)$. Ruszczyński (2010) shows that an optimal Markovian policy exists, and the optimal value functions can be computed recursively. The Bellman optimality equation is given by

$$Q_{h}^{*}(s_{h}, a_{h}) = r_{h}(s_{h}, a_{h}) + \rho_{h}(V_{h+1}^{*}, P_{h}(s_{h}, a_{h}))$$

$$V_{h}^{*}(s_{h}) = \max_{a \in \mathcal{A}} Q_{h}^{*}(s_{h}, a_{h}), V_{H+1}^{*}(s_{H+1}) = 0.$$
 (2)

The optimal policy is the greedy policy with respect to the optimal action-value function, i.e., $\pi_h^*(s) = \arg \max_{a \in \mathcal{A}} Q_h^*(s, a)$.

Table 1: Lipschitz constants of risk measures

	OCE	CVaR	ERM	DisRM	PH	LB
$L_1([0,M])$	u'(-M)	$\frac{1}{\alpha}$	$e^{ \beta M}$	$\max g'(x)$	pM^{p-1}	$\frac{q^2}{(q-1)e}$
$L_{\infty}([0,M])$	-u(-M)	$\frac{M}{\alpha}$	$\frac{e^{ \beta M}-1}{ \beta }$	$M \max g'(x)$	pM^p	$\frac{Mq^2}{(q-1)e}$

Regret. We define the regret of an algorithm alg interacting with an MDP \mathcal{M} for K episodes as

Regret(alg,
$$\mathcal{M}, K$$
) $\triangleq \sum_{k=1}^{K} V_1^*(s_1^k) - V_1^{\pi^k}(s_1^k).$

The regret quantifies the accumulated suboptimality gap of an algorithm compared to the optimal policy. It is a random variable due to the randomness in π^k , which is introduced by the algorithm. We denote the expected regret by $\mathbb{E}[\text{Regret}(alg, \mathcal{M}, K)]$. We may omit the notation π and \mathcal{M} when clear from the context.

3 ALGORITHM

In this section, we introduce two algorithms that leverage the OFU principle in distinct manner for efficient learning. Both algorithms consistently update an empirical model throughout the learning phase, categorizing them under the model-based algorithm class. The major difference lies in that Algorithm 1 uses the exploration bonus to incentive exploration, while Algorithm 2 builds an optimistic model from the empirical model for efficient exploration. Algorithm 1 surpasses Algorithm 2 in terms of computational efficiency. While both algorithms enjoy the same regret upper bound, empirical evidence suggests that Algorithm 2 outperforms Algorithm 1 in practice. Our proposed algorithms operate under the following assumption:

Assumption 1. For each $h \in [H]$, ρ_h is Lipschitz continuous with respect to $\|\cdot\|_1$ and $\|\cdot\|_{\infty}$, and satisfies $\rho_h : \mathscr{D}([a,b]) \to [a,b].$

The second condition in Assumption 1 is relatively mild, as it is met by prevalent risk measures. Specifically, it is easy to check the condition for CVaR and ERM. For simplicity, we omit ρ and write $L_{p,h} \triangleq L_p(\rho_h, [0, H-h])$ for $h \in [H-1]$. For two probability mass functions (PMFs) P and Q sharing identical support, we overload notation and represent their ℓ_1 distance as $||P - Q||_1 :=$ $\sum_i |P_i - Q_i|$.

3.1 UCBVI-DRM

The Upper Confidence Bound Value Iteration for Dynamic Risk Measure (UCBVI-DRM, cf. Algorithm 1) algorithm uses the bonus term to ensure optimism in the estimation of the value function, considering the nonlinearity of the risk measure. In each step h of episode k, the optimistic value function is obtained by adding a bonus term b_h^k to the empirical value. The empirical value is constructed by approximating the Bellman optimality equation (Equation 2) with empirical model. The empirical model is maintained and updated based on the visiting counts

$$\begin{split} N_h^k(s,a) &\triangleq \sum_{\tau=1}^{k-1} \mathbb{I}\left\{ (s_h^\tau, a_h^\tau) = (s,a) \right\}, \\ N_h^k(s,a,s') &\triangleq \sum_{\tau=1}^{k-1} \mathbb{I}\left\{ (s_h^\tau, a_h^\tau, s_{h+1}^\tau) = (s,a,s') \right\}. \end{split}$$

The empirical model \hat{P}_h^k for step h in episode k is set to be the visiting frequency

$$\hat{P}_h^k(s'|s,a) = \frac{N_h^k(s,a,s')}{N_h^k(s,a) \vee 1}.$$

The bonus term b_h^k is composed of two factors: the estimation error of the next-state value distribution and the Lipschitz constant of the risk measure. Using the DKW inequality (Fact 5), the estimation error can be bounded as

$$\left\| (\hat{P}_h^k, V_{h+1}^*) - (P_h, V_{h+1}^*) \right\|_{\infty} \le \sqrt{\frac{\iota}{2(N_h^k(\cdot, \cdot) \lor 1)}},$$

where ι is a confidence level to be specified later. This error term captures the uncertainty in the empirical model. The Lipschitz constant $L_{\infty,h}$ of the risk measure reflects its sensitivity to changes in the underlying distributions. Multiplying these two factors together yields the exploration bonus term, which is added to the empirical value function estimate. This bonus term encourages exploration in situations where the model estimation error is large or the risk measure is sensitive. By carefully designing the bonus term, UCBVI-DRM achieves optimism in its value function estimates, promoting exploration while considering the nonlinearity of the risk measure. This allows the algorithm to balance exploration and exploitation, taking into account the uncertainty in the model and the smoothness of the risk measure.

Remark 1. Algorithm 1 provides a general framework that subsumes other algorithms such as ICVaR-VI in Du et al. (2023) for dynamic CVaR and OCE-VI in Algorithm 1 UCBVI-DRM 1: Input: $(\rho_h)_{h\in [H-1]}, T$ and δ 2: Initialize $N_h^k(\cdot, \cdot) \leftarrow 0, \hat{P}_h^k(\cdot, \cdot) \leftarrow \frac{1}{S}\mathbf{1}, \iota \leftarrow$ $\log(SAT)$ 3: for k = 1 : K do
$$\begin{split} V_{H}^{k}(\cdot) &\leftarrow \max_{a} r_{H}(\cdot, a) \\ \mathbf{for} \ h &= H - 1 : 1 \ \mathbf{do} \\ b_{h}^{k}(\cdot, \cdot) &\leftarrow L_{\infty,h} \sqrt{\frac{\iota}{2(N_{h}^{k}(\cdot, \cdot) \vee 1)}} \end{split}$$
4: 5:6: $\begin{array}{rcl} Q_h^k(\cdot,\cdot) &\leftarrow r_h(\cdot,\cdot) + \rho_h(V_{h+1}^k,\hat{P}_h^k(\cdot,\cdot)) + \\ b_h^k(\cdot,\cdot) & & \\ & V_h^k(\cdot) \leftarrow \max_{a \in \mathcal{A}} Q_h^k(\cdot,a) \end{array}$ 7:8: 9: end for Receive s_1^k 10: for h = 1 : H do 11: Take action $a_h^k \leftarrow \arg \max_{a \in \mathcal{A}} Q_h^k(s_h^k, a)$ 12:and transition to s_{h+1}^k Update $N_h^k(\cdot, \cdot)$ and $\hat{P}_h^k(\cdot, \cdot)$ 13:14: end for 15: end for

Xu et al. (2023) for dynamic OCE. In particular, our bonus term matches theirs by setting $L_{\infty,h} = (H - h)/\alpha$ for CVaR and $L_{\infty,h} = u(-(H - h))$ for OCE. Furthermore, Algorithm 1 accommodates a wider range of risk measures, including distortion risk measure with specific instances shown in Table 1.

3.2 OVI-DRM

The Optimistic Value Iteration for Dynamic Risk Measure (OVI-DRM, cf. Algorithm 2) is a model-based algorithm which injects the optimism in the estimated model. For each step h in episode k, the algorithm constructs an optimistically estimated transition model \tilde{P}_h^k based on a high probability concentration bound on the empirical transition model \hat{P}_h^k . This optimistic model allows for exploration and promotes optimism in the face of uncertainty. Using the optimistic model \tilde{P}_h^k , the algorithm approximates the Bellman optimality equation (Equation 2) to obtain optimistic value functions Q_h^k .

Fix an (s, a, k, k), The **O**ptimistic **Model** (OM, cf. Algorithm 3) algorithm takes the empirical model $\hat{P}_{h}^{k}(s, a)$, the value at the next step V_{h+1}^{k} , and a confidence radius $c_{h}^{k}(s, a)$ as input and outputs the optimistic model $\tilde{P}_{h}^{k}(s, a)$. For a PMF P and a real number c > 0, denote by $B_{1}(P, c) \triangleq \{P' | \|P' - P\|_{1} \leq c\}$ the ℓ_{1} norm ball centered at P with radius c. Lemma 1 shows that OM can output an optimistic model \tilde{P} whose value distribution dominates those generated by the model within the concentration ball.

Lemma 1. Let P, V, c be the input of OM and \tilde{P} be the

output. It holds that

$$(P, V) \succeq (Q, V), \forall Q \in B_1(P, c).$$

Lemma 2 together with the monotonicity of ρ_h implies that $\forall P' \in B_1(\hat{P}_h^k(s, a), c_h^k(s, a)), \tilde{P}_h^k(s, a)$ satisfies

$$\rho_h(\tilde{P}_h^k(s,a), V_{h+1}^k) \ge \rho_h(P', V_{h+1}^k).$$

In Appendix D, we will show that $P_h(s,a) \in B_1(\hat{P}_h^k(s,a), c_h^k(s,a))$ with high probability. Suppose $V_{h+1}^k(s) \geq V_{h+1}^*(s), \forall s$. It follows that $\forall (s,a)$, we have

$$Q_{h}^{k}(s,a) = r_{h}(s,a) + \rho_{h}(\tilde{P}_{h}^{k}(s,a), V_{h+1}^{k})$$

$$\geq r_{h}(s,a) + \rho_{h}(P_{h}(s,a), V_{h+1}^{k})$$

$$\geq r_{h}(s,a) + \rho_{h}(P_{h}(s,a), V_{h+1}^{*}) = Q_{h}^{*}(s,a).$$

The second inequality is due to the monotonicity of ρ_h together with the fact that

$$V_{h+1}^k \ge V_{h+1}^* \Longrightarrow (P_h(s,a), V_{h+1}^k) \succeq (P_h(s,a), V_{h+1}^*).$$

Then we have $V_h^k(s) = \max Q_h^k(s, a) \ge \max Q_h^*(s, a) = V_h^*(s), \forall s$. By induction, we obtain

$$V_h^k(s) \ge V_h^*(s), \forall (k, h, s).$$

This implies that the value functions induced by the optimistic models are indeed optimistic compared to the optimal value functions.

By using an optimistically estimated model, the OVI-DRM algorithm promotes exploration and encourages the agent to take actions that have the potential for higher values.

Remark 2. The computational complexity of running the subroutine OM in Algorithm is $O(S \log S)$. In contrast, the computational complexity of calculating the bonus term is simply O(1). Therefore, Algorithm 1 outweighs Algorithm 2 in terms of computational efficiency. Although both algorithms enjoy the same regret upper bound, Algorithm 2 is shown to empirically outperform Algorithm 1. The intuition lies in the different optimism levels injected by the two algorithms. Specifically, Algorithm 1 employs the Lipschitz constant of the risk measure, resulting in an inflated upper bound on values. In contrast, Algorithm 2, with its reliance on the optimistic model, constructs a tighter bound, ensuring a more grounded optimism and, thus, superior empirical outcomes.

4 MAIN RESULTS

For convenience, we define $\tilde{L}_{1,t} \triangleq \prod_{i=1}^{t} L_{1,i}$ for $t \in [H]$.

Algorithm 2 OVI-DRM

1: Input: $(\rho_h)_{h \in [H-1]}$, T and δ 2: Initialize $N_h^k(\cdot, \cdot) \leftarrow 0, \hat{P}_h^k(\cdot, \cdot) \leftarrow \frac{1}{S}\mathbf{1}$ 3: for k = 1 : K do $V_H^k(\cdot) \leftarrow \max_a r_H(\cdot, a)$ 4: $\begin{aligned} & \mathbf{for} \ h = H - 1 : 1 \ \mathbf{do} \\ & c_h^k(\cdot, \cdot) \leftarrow \sqrt{\frac{2S}{N_h^k(\cdot, \cdot) \lor 1}} \iota \end{aligned}$ 5: 6: $\tilde{P}_h^k(\cdot, \cdot) \leftarrow \mathrm{OM}\left(\hat{P}_h^k(\cdot, \cdot), V_h^k, c_h^k(\cdot, \cdot)\right)$ 7: $\begin{aligned} Q_{h}^{k}(\cdot,\cdot) &\leftarrow r_{h}(\cdot,\cdot) + \rho_{h}(V_{h+1}^{k},\tilde{P}_{h}^{k}(\cdot,\cdot)) \\ V_{h}^{k}(\cdot) &\leftarrow \max_{a \in \mathcal{A}} Q_{h}^{k}(\cdot,a) \end{aligned}$ 8: 9: end for 10: Receive s_1^k 11: 12:for h = 1 : H do Take action $a_h^k \leftarrow \arg \max_{a \in \mathcal{A}} Q_h^k(s_h^k, a)$ 13:and transition to s_{h+1}^k Update $N_h^k(\cdot, \cdot)$ and $\hat{P}_h^k(\cdot, \cdot)$ 14:15:end for 16: end for

Algorithm 3 OM

- 1: Input: $P = (P(s_1), \dots, P(s_S)), V = (V(s_1), \dots, V(s_S))$ and c > 0
- 2: Sorting: let $V' = (V(s_{(1)}), \dots, V(s_{(S)}))$ such that $V(s_{(1)}) \leq V(s_{(2)}) \leq \dots \leq V(s_{(S)})$
- 3: Permutation: let $P' = (P(s_{(1)}), \dots, P(s_{(S)}))$
- 4: Transport: sequentially move probability mass $\frac{c}{2} \wedge 1$ of the leftmost states to $s_{(S)}$

4.1 Worst-case Regret Bounds

Theorem 1 (Worst-case regret upper bound). Fix $\delta \in (0, 1)$. Suppose Assumption 1 holds. Algorithm 1 and Algorithm 2 satisfy for any MDP \mathcal{M}

$$\operatorname{Regret}(K) \le \tilde{\mathcal{O}}\left(\sum_{h=1}^{H-1} L_{\infty,h} \tilde{L}_{1,h-1} \cdot \sqrt{S^2 A K}\right)$$

with probability at least $1 - \delta$, where $\iota \triangleq \log(4SAT/\delta)$.

Proof Sketch. For simplicity, we only provide the proof sketch for UCBVI-DRM. The proof structure builds upon the framework established in Azar et al. (2017), but we introduce new techniques to address the specific challenges posed by nonlinear risk measures. We first exploit the Lipschitz continuity w.r.t. $\|\cdot\|_{\infty}$ together with the DKW inequality to establish the optimism of V_h^k . Next, standard techniques fail to obtain the recursion of the value gap due to the nonlinearity of the risk measure. Our key observation to overcome the difficulty is a simple transport inequality (cf. Lemma 6) together with the Lipschitz continuity w.r.t. $\|\cdot\|_1$.

Remark 3. In the risk-neutral setting, the Lipschitz

constants take $L_{\infty,h} = H - h$ and $L_{1,h} = 1$, which leads to the bound of $\tilde{O}\left(H^2\sqrt{S^2AK}\right)$.

Theorem 2 (Minimax Lower Bound). For any algorithm alg, there exists an MDP \mathcal{M} such that for sufficiently large K

$$\mathbb{E}[Regret(alg, \mathcal{M}, K)] \geq \Omega\left(c_{\rho}H\sqrt{SAT}\right),$$

where c_{ρ} is a constant dependent on the risk measure

Our proof methodology draws inspiration from the framework presented in Domingues et al. (2021). The coefficient c_{ρ} serves as a risk-dependent parameter linked to the non-smoothness of the given risk measure. Intuitively, it can be thought of as the "anti-Lipschitz constant" for the risk measure, especially in relation to Bernoulli distributions, as expressed by:

$$\rho(\operatorname{Ber}(p)) - \rho(\operatorname{Ber}(q)) \ge c_{\rho}|p-q|.$$

This coefficient, c_{ρ} , quantifies the non-smoothness of the risk measure, and is always smaller than the Lipschitz constant. For certain risk measures like mean, ERM, and CVaR, it is seen to match the Lipschitz constant up to a numerical constant. Moreover, it leads to tight minimax lower bounds when applied to mean and ERM. Nevertheless, it remains uncertain whether this constant yields a tight lower bound across all dynamic risk measures. To our knowledge, this is the first result that characterizes the hardness of RSRL when using a general DRM.

Comparisons and Discussions. We compare our regret bounds with that of Xu et al. (2023) in the dynamic OCE setting. By instantiating the Lipschitz constants of OCE with $L_{\infty,h} = u(-H+h)$ and $L_{1,h} = u'_{-}(-H+h)$, their bound can be translated into $\tilde{\mathcal{O}}\left(\sum_{h=1}^{H-1} L_{\infty,h}\sqrt{\tilde{L}_{1,h-1}S^2AK}\right)$. Our bound matches

their result with additional factors $\sqrt{\tilde{L}_{1,h-1}}$. This is because they employ a change-of-measure technique based on the concave optimization representation of OCE to derive a tighter recursion of value gaps, which cannot be easily extended to general risk measures. The Algorithm 1, however, still enjoy the same regret bound as that in Xu et al. (2023) since our algorithm reduces to **OCE-VI** for the dynamic OCE. Furthermore, numerical experiments in Appendix E shows that Algorithm 2 empirically outperforms Algorithm 1 for dynamic CVaR problem. Our lower bound also matches the lower bound in Xu et al. (2023), both of which are tight in S, A, K, H and depend on some constant related to the risk measure.

In the dynamic CVaR setting, which is a special case of dynamic OCE, our upper bound matches the bound $\tilde{\mathcal{O}}\left(H^2\sqrt{S^2AK}/\sqrt{\alpha^H}\right)$ in Du et al. (2023) up to a factor of $1/\sqrt{\alpha^{H}}$. Algorithm 1 subsumes ICVaR-VI for the dynamic CVaR problem. In contrast to Du et al. (2023) that provides a algorithm-dependent lower bound, we provide minimax and gap-dependent lower bound. Furthermore, Lam et al. (2023) considers dynamic coherent risk measures and non-linear function approximation, and their regret bounds are derived under the assumption of a weak simulator. As a result, our regret bounds are not directly comparable to theirs.

The minimax lower bound is tight in terms of S, A, K, H, and c_{ρ} might be loose. The intuition is that our bound matches the tight minimax lower bound $\Omega(H\sqrt{SAT})$ for risk-neutral MDP since $c_{\rho} = 1$ when the risk measure is mean. On the other hand, the tightness of c_{ρ} depends on the choice of risk measure. For the well studied mean and ERM, the tight lower bounds are known to be $\Omega(H\sqrt{SAT})$ and $\Omega(\frac{\exp(\beta H)-1}{\beta H}H\sqrt{SAT})$ respectively. Through our analysis, c_{ρ} reduces to 1 and $\frac{\exp(\beta cH)-1}{\beta H}$ ($c \in (0,1)$ is a constant), which is (nearly) optimal. When navigating through risk measures such as CVaR or broader one, we are not aware of tight minimax lower bound, therefore it is unclear whether c_{ρ} is tight in general. In fact, tight minimax lower bound for general dynamic risk measures is very unexplored. Nevertheless, c_{ρ} reflects how the choice of different risk measures affects the hardness of the problem in a general sense.

Theorem 1 and Theorem 2 imply that RSRL with Lipschitz DRM can achieve regret bound that is minimaxoptimal in terms of K and A. Specifically, the gap between the upper and lower bounds is determined by two factors: \sqrt{S} and a multiplicative Lipschitz constant $\tilde{L}_{1,H}$. Achieving further improvements in these factors might be challenging, especially for general risk measures, under the mild Lipschitz assumption.

Gap-dependent Regret Bounds 4.2

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Fix $h \in [H]$, $(s, a) \in \mathcal{S} \times \mathcal{A}$, the sub-optimality gap of (s, a) at step h is defined as $\Delta_h(s, a) \triangleq V_h^*(s, a) Q_{h}^{*}(s,a)$. The minimum sub-optimality gap is defined as the minimum non-zero gap

$$\Delta_{\min} \triangleq \min_{h,s,a} \left\{ \Delta_h(s,a) : \Delta_h(s,a) > 0 \right\}.$$

Theorem 3 (Gap-dependent regret upper bound). *Fix* $\delta \in (0,1)$. With probability at least $1-\delta$, Algorithm 1 and Algorithm 2 satisfy

$$Regret(K) \le \mathcal{O}\left(\frac{S^2 A H\left(\sum_{h=1}^{H-1} \tilde{L}_{1,h-1} L_{\infty,h}\right)^2}{\Delta_{min}} \log(SAT)\right).$$

We follow the standard convention in the literature for the gap-dependent lower bound. The lower bound is stated for algorithms that have sublinear worst-case regret. Specifically, we say that an algorithm alg is α -uniformly good if for any MDP \mathcal{M} , there exists a constant $C_{\mathcal{M}} > 0$ such that Regret(alg, $\mathcal{M}, K) \leq C_{\mathcal{M}} K^{\alpha}$. The construction of proof is based on Simchowitz and Jamieson (2019).

Theorem 4 (Gap-dependent regret lower bound). There exists an MDP \mathcal{M} such that any α -uniformly good algorithm alg satisfies

$$\lim_{K \to \infty} \frac{Regret(\mathfrak{alg}, \mathcal{M}, K)}{\log K} = \Omega\left((1 - \alpha) \sum_{(s,a):\Delta_1(s,a)>0} \frac{(c_{\rho}H)^2}{\Delta_1(s,a)} \right)$$

To our knowledge, Theorem 3 provides the first result showing that RSRL with DRMs can achieve $\log T$ -type regret. The lower bound shows that for sufficiently large K, the logarithmic dependence on K is unavoidable. Notably, it implies that our algorithms have a tight dependency on A and K. Furthermore, the presence of a constant factor in both the upper and lower bounds suggests that the specific choice of risk measure can significantly affect its performance.

EXPERIMENTS 5

In this section, we provide some numerical results to validate the empirical performance of our algorithms. We compare our algorithms to the algorithms UCBVI (Azar et al., 2017) for risk-neutral RL and RSVI2 (Fei et al., 2021a) for RSRL with ERM.



Figure 1: Comparison of different algorithms for dynamic CVaR.

In our experiments, we focus on an MDP with S = 3

states, A = 5 actions, and a horizon H = 5, which is similar to the construction in Du et al. (2023). The major difference is that we consider a non-stationary MDP. The MDP consists of a fixed initial state denoted as state 0, and three additional states denoted as states 1, 2, and 3. In step $2 \le h \le H$, the three states generate reward 1,0 and 0.4, respectively. The agent starts from state 0 in the first step, takes action from [A], and then transitions to one of three states $\{1, 2, 3\}$ in the next step. Any action in [A - 1] leads to a uniform transition to state 1 and state 2. The optimal action A leads to a transition to state 2 and state 3 with probability 0.001 and 0.999. We set $\delta = 0.005$, A = 5, H = 5, K = 10000, and $\alpha = (0.05, 0.05, 0.05)$.

As shown in Figure 1, OVI-DRM and UCBVI-DRM enjoy sublinear regret while the risk-neutral algorithm UCBVI and RSVI2 suffer linear regret. In particular, OVI-DRM outperforms UCBVI-DRM because it achieves a better balance between exploration and exploitation. In Appendix A, we provide more comprehensive numerical experiments. We show the results for MDP with larger sizes S = 3, A = 10, H = 12. Moreover, we also conduct experiments for the ERM and the mean-variance risk measure.

6 CONCLUSIONS

We propose two model-based algorithms for the broad class of Lipschitz DRMs. To establish the efficacy of our algorithms, we provide theoretical guarantees in the form of worst-case and gap-dependent regret upper bounds. To complement our upper bounds, we also establish regret lower bounds. These lower bounds demonstrate the inherent difficulty of the problem. Our work offers a unified framework that not only encompasses multiple existing RSRL formulations in the literature but also broadens the application spectrum.

There are several promising future directions. It might be possible to improve the regret upper bounds by designing new algorithms or improving the analysis. Currently, our algorithms and analysis are primarily focused on tabular MDPs. However, extending the results to the setting of function approximation, such as linear function approximation, is an important and challenging task. The nonlinearity of risk measures poses a significant obstacle in this context. One potential approach to address this issue is to leverage techniques like value-targeted regression, as proposed in Ayoub et al. (2020); Jia et al. (2020), and integrate them into our framework.

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References

- Acerbi, C. (2002). Spectral measures of risk: A coherent representation of subjective risk aversion. *Journal* of Banking & Finance, 26(7):1505–1518.
- Acerbi, C. and Tasche, D. (2002). On the coherence of expected shortfall. *Journal of Banking & Finance*, 26(7):1487–1503.
- Artzner, P., Delbaen, F., Eber, J.-M., and Heath, D. (1999). Coherent measures of risk. *Mathematical finance*, 9(3):203–228.
- Asienkiewicz, H. and Jaśkiewicz, A. (2017). A note on a new class of recursive utilities in markov decision processes. *Applicationes Mathematicae*, 44:149–161.
- Ayoub, A., Jia, Z., Szepesvari, C., Wang, M., and Yang, L. (2020). Model-based reinforcement learning with value-targeted regression. In *International Confer*ence on Machine Learning, pages 463–474. PMLR.
- Azar, M. G., Osband, I., and Munos, R. (2017). Minimax regret bounds for reinforcement learning. In *In*ternational Conference on Machine Learning, pages 263–272. PMLR.
- Balbás, A., Garrido, J., and Mayoral, S. (2009). Properties of distortion risk measures. *Methodology and Computing in Applied Probability*, 11(3):385–399.
- Bastani, O., Ma, J. Y., Shen, E., and Xu, W. (2022). Regret bounds for risk-sensitive reinforcement learning. Advances in Neural Information Processing Systems, 35:36259–36269.
- Bäuerle, N. and Glauner, A. (2021). Minimizing spectral risk measures applied to markov decision processes. *Mathematical Methods of Operations Re*search, 94(1):35–69.
- Bäuerle, N. and Glauner, A. (2022). Markov decision processes with recursive risk measures. *European Journal of Operational Research*, 296(3):953–966.
- Bäuerle, N. and Ott, J. (2011). Markov decision processes with average-value-at-risk criteria. *Mathematical Methods of Operations Research*, 74:361–379.
- Ben-Tal, A. and Teboulle, M. (2007). An old-new concept of convex risk measures: the optimized certainty equivalent. *Mathematical Finance*, 17(3):449–476.

- Bhat, S. P. and LA, P. (2019). Concentration of risk measures: A wasserstein distance approach. Advances in neural information processing systems, 32.
- Bielecki, T. R., Pliska, S. R., and Sherris, M. (2000). Risk sensitive asset allocation. *Journal of Economic Dynamics and Control*, 24(8):1145–1177.
- Chateauneuf, A. and Cohen, M. (2008). Cardinal extensions of EU model based on the Choquet integral. Documents de travail du Centre d'Economie de la Sorbonne 2008.87 - ISSN : 1955-611X.
- Chow, Y., Tamar, A., Mannor, S., and Pavone, M. (2015). Risk-sensitive and robust decision-making: a cvar optimization approach. *Advances in neural information processing systems*, 28.
- Chu, S. and Zhang, Y. (2014). Markov decision processes with iterated coherent risk measures. *Interna*tional Journal of Control, 87(11):2286–2293.
- Coache, A. and Jaimungal, S. (2021). Reinforcement learning with dynamic convex risk measures. arXiv preprint arXiv:2112.13414.
- Coache, A., Jaimungal, S., and Cartea, A. (2022). Conditionally elicitable dynamic risk measures for deep reinforcement learning. arXiv preprint arXiv:2206.14666.
- Davis, M. and Lleo, S. (2008). Risk-sensitive benchmarked asset management. *Quantitative Finance*, 8(4):415–426.
- Delage, E. and Mannor, S. (2010). Percentile optimization for markov decision processes with parameter uncertainty. *Operations research*, 58(1):203–213.
- Ding, Y., Jin, M., and Lavaei, J. (2023). Non-stationary risk-sensitive reinforcement learning: Near-optimal dynamic regret, adaptive detection, and separation design. In *Proceedings of the AAAI Conference on Artificial Intelligence*, volume 37, pages 7405–7413.
- Domingues, O. D., Ménard, P., Kaufmann, E., and Valko, M. (2021). Episodic reinforcement learning in finite mdps: Minimax lower bounds revisited. In *Algorithmic Learning Theory*, pages 578–598. PMLR.
- Du, Y., Wang, S., and Huang, L. (2023). Provably efficient risk-sensitive reinforcement learning: Iterated cvar and worst path. In *The Eleventh International Conference on Learning Representations*.
- Ernst, D., Stan, G.-B., Goncalves, J., and Wehenkel, L. (2006). Clinical data based optimal sti strategies for hiv: a reinforcement learning approach. In *Pro*ceedings of the 45th IEEE Conference on Decision and Control, pages 667–672. IEEE.
- Fei, Y. and Xu, R. (2022). Cascaded gaps: Towards logarithmic regret for risk-sensitive reinforcement learning. In *International Conference on Machine Learning*, pages 6392–6417. PMLR.

- Fei, Y., Yang, Z., Chen, Y., and Wang, Z. (2021a). Exponential bellman equation and improved regret bounds for risk-sensitive reinforcement learning. Advances in Neural Information Processing Systems, 34:20436–20446.
- Fei, Y., Yang, Z., Chen, Y., Wang, Z., and Xie, Q. (2020). Risk-sensitive reinforcement learning: Nearoptimal risk-sample tradeoff in regret. Advances in Neural Information Processing Systems, 33:22384– 22395.
- Fei, Y., Yang, Z., and Wang, Z. (2021b). Risk-sensitive reinforcement learning with function approximation: A debiasing approach. In *International Conference* on Machine Learning, pages 3198–3207. PMLR.
- Föllmer, H. and Knispel, T. (2011). Entropic risk measures: Coherence vs. convexity, model ambiguity and robust large deviations. *Stochastics and Dynamics*, 11(02n03):333–351.
- Garivier, A., Ménard, P., and Stoltz, G. (2019). Explore first, exploit next: The true shape of regret in bandit problems. *Mathematics of Operations Research*, 44(2):377–399.
- Howard, R. A. and Matheson, J. E. (1972). Risksensitive markov decision processes. *Management* science, 18(7):356–369.
- Huang, A., Leqi, L., Lipton, Z., and Azizzadenesheli, K. (2021). Off-policy risk assessment in contextual bandits. Advances in Neural Information Processing Systems, 34:23714–23726.
- Iyengar, G. N. (2005). Robust dynamic programming. Mathematics of Operations Research, 30(2):257–280.
- Jia, Z., Yang, L., Szepesvari, C., and Wang, M. (2020). Model-based reinforcement learning with value-targeted regression. In *Learning for Dynamics* and Control, pages 666–686. PMLR.
- Jiang, D. R. and Powell, W. B. (2016). Practicality of nested risk measures for dynamic electric vehicle charging. arXiv preprint arXiv:1605.02848.
- Lam, T., Verma, A., Low, B. K. H., and Jaillet, P. (2023). Risk-aware reinforcement learning with coherent risk measures and non-linear function approximation. In *The Eleventh International Conference* on Learning Representations.
- Liang, H. and Luo, Z.-Q. (2022). Bridging distributional and risk-sensitive reinforcement learning with provable regret bounds. arXiv preprint arXiv:2210.14051.
- Liang, H. and Luo, Z.-q. (2023). A distribution optimization framework for confidence bounds of risk measures. arXiv preprint arXiv:2306.07059.

- Massart, P. (1990). The tight constant in the dvoretzkykiefer-wolfowitz inequality. *The annals of Probability*, pages 1269–1283.
- Osogami, T. (2012). Iterated risk measures for risksensitive markov decision processes with discounted cost. arXiv preprint arXiv:1202.3755.
- Prashanth, L. and Bhat, S. P. (2022). A wasserstein distance approach for concentration of empirical risk estimates. *The Journal of Machine Learning Re*search, 23(1):10830–10890.
- Rockafellar, R. T., Uryasev, S., et al. (2000). Optimization of conditional value-at-risk. *Journal of risk*, 2:21–42.
- Rudloff, B., Sass, J., and Wunderlich, R. (2008). Entropic risk constraints for utility maximization. *Festschrift in celebration of prof. Dr. Wilfried Grecksch's 60th birthday*, pages 149–180.
- Ruszczyński, A. (2010). Risk-averse dynamic programming for markov decision processes. *Mathematical programming*, 125(2):235–261.
- Shen, Y., Stannat, W., and Obermayer, K. (2013). Risksensitive markov control processes. SIAM Journal on Control and Optimization, 51(5):3652–3672.
- Simchowitz, M. and Jamieson, K. G. (2019). Nonasymptotic gap-dependent regret bounds for tabular mdps. Advances in Neural Information Processing Systems, 32.
- Sutton, R. S. and Barto, A. G. (2018). Reinforcement learning: An introduction. MIT press.
- Tversky, A. and Kahneman, D. (1992). Advances in prospect theory: Cumulative representation of uncertainty. *Journal of Risk and uncertainty*, 5:297–323.
- Wang, K., Kallus, N., and Sun, W. (2023). Nearminimax-optimal risk-sensitive reinforcement learning with cvar. arXiv preprint arXiv:2302.03201.
- Weissman, T., Ordentlich, E., Seroussi, G., Verdu, S., and Weinberger, M. J. (2003). Inequalities for the 11 deviation of the empirical distribution. *Hewlett-Packard Labs, Tech. Rep.*
- Wiesemann, W., Kuhn, D., and Rustem, B. (2013). Robust markov decision processes. *Mathematics of Operations Research*, 38(1):153–183.
- Wirch, J. L. and Hardy, M. R. (2001). Distortion risk measures: Coherence and stochastic dominance. In *International congress on insurance: Mathematics* and economics, pages 15–17.
- Xu, W., Gao, X., and He, X. (2023). Regret bounds for markov decision processes with recursive optimized certainty equivalents. arXiv preprint arXiv:2301.12601.

Zhang, R., Hu, Y., and Li, N. (2023). Regularized robust mdps and risk-sensitive mdps: Equivalence, policy gradient, and sample complexity. arXiv preprint arXiv:2306.11626.

Checklist

- 1. For all models and algorithms presented, check if you include:
 - (a) A clear description of the mathematical setting, assumptions, algorithm, and/or model. [Yes]
 - (b) An analysis of the properties and complexity (time, space, sample size) of any algorithm. [Yes]
 - (c) (Optional) Anonymized source code, with specification of all dependencies, including external libraries. [No]
- 2. For any theoretical claim, check if you include:
 - (a) Statements of the full set of assumptions of all theoretical results. [Yes]
 - (b) Complete proofs of all theoretical results. [Yes]
 - (c) Clear explanations of any assumptions. [Yes]
- 3. For all figures and tables that present empirical results, check if you include:
 - (a) The code, data, and instructions needed to reproduce the main experimental results (either in the supplemental material or as a URL).
 [Yes]
 - (b) All the training details (e.g., data splits, hyperparameters, how they were chosen). [Not Applicable]
 - (c) A clear definition of the specific measure or statistics and error bars (e.g., with respect to the random seed after running experiments multiple times). [Not Applicable]
 - (d) A description of the computing infrastructure used. (e.g., type of GPUs, internal cluster, or cloud provider). [Not Applicable]
- 4. If you are using existing assets (e.g., code, data, models) or curating/releasing new assets, check if you include:
 - (a) Citations of the creator If your work uses existing assets. [Not Applicable]
 - (b) The license information of the assets, if applicable. [Not Applicable]
 - (c) New assets either in the supplemental material or as a URL, if applicable. [Not Applicable]
 - (d) Information about consent from data providers/curators. [Not Applicable]
 - (e) Discussion of sensible content if applicable, e.g., personally identifiable information or offensive content. [Not Applicable]

- 5. If you used crowdsourcing or conducted research with human subjects, check if you include:
 - (a) The full text of instructions given to participants and screenshots. [Not Applicable]
 - (b) Descriptions of potential participant risks, with links to Institutional Review Board (IRB) approvals if applicable. [Not Applicable]
 - (c) The estimated hourly wage paid to participants and the total amount spent on participant compensation. [Not Applicable]

A Experiments

We provide more comprehensive numerical experiments here. We show the results for MDP with larger sizes S = 3, A = 12, H = 10 in Figure 2, in contrast to the original setting S = 3, A = 5, H = 5. Moreover, we also conduct experiments for the entropic risk measure (cf. Figure 2b) and the mean-variance risk measure (cf. Figure 2c). The mean-variance is defined as

$$MV(X) \triangleq \mathbb{E}[X] - c \cdot \mathbb{V}[X],$$

where c > 0 is the risk coefficient that adjusts the degree of risk aversion. Figure 2 illustrates the superior performance of OVI-DRM in comparison to UCBVI-DRM and UCBVI across diverse risk-sensitive scenarios. Specifically, OVI-DRM achieves significantly lower regret than UCBVI-DRM due to its more conservative optimism injection.



 $\frac{100}{4000}$

UCBVI-DRM 0.010

OVI-DRM 0.182

UCBVI 0.504

6000

5000

(a) Comparison of different algorithms for CVaR with $\alpha = 0.05$.

(b) Comparison of different algorithms for entropic risk measure with $\beta = -1.5$.

10000

8000

Entropic Risk Measure



(c) Comparison of different algorithms for mean-variance risk measure with c = -0.1.

Figure 2: Enlarged MDP with S = 3, A = 12, H = 10.

B Risk Measures

B.1 Definitions

Conditional Value at Risk (CVaR) The CVaR value (Rockafellar et al., 2000) at level $\alpha \in (0, 1)$ for a distribution F is defined as

$$C_{\alpha}(F) \triangleq \sup_{\nu \in \mathbb{R}} \left\{ \nu - \frac{1}{\alpha} \mathbb{E}_{X \sim F}[(\nu - X)^{+}] \right\}.$$

Acerbi and Tasche (2002) showed that when F is a continuous distribution, $C_{\alpha}(F) = \mathbb{E}_{X \sim F}[X|X \leq F^{-1}(\alpha)].$

Spectral risk measure (SRM) SRM is class of risk measures that generalizes CVaR via adopting a nonconstant weighting function over the quantiles (Acerbi, 2002). The SRM value of F is defined as

$$S_{\phi}(F) \triangleq \int_0^1 \phi(y) F^{-1}(y) dy,$$

where $\phi : [0,1] \to [0,\infty)$ is the weighting function. Acerbi (2002) showed that an SRM is coherent if ϕ is is decreasing and satisfies that $\int_0^1 \phi(y) dy = 1$. SRM can be viewed as a weighted average of quantiles, with weight specified by $\phi(y)$. In fact, $S_{\phi}(F)$ specializes in $C_{\alpha}(F)$ for $\phi(y) = \frac{1}{\alpha} \mathbb{I}\{0 \le y \le \alpha\}$.

Distortion risk measure For a distribution $F \in \mathscr{D}([0,\infty))$, the distortion risk measure (Balbás et al., 2009; Wirch and Hardy, 2001) $\rho_q(F)$ is defined as

$$\rho_g(F) \triangleq \int_0^\infty g(1 - F(x)) dx,$$

where $g: [0,1] \to [0,1]$ is a continuous increasing function with g(0) = 0 and g(1) = 1. We refer to g as the distortion function. Distortion risk measure is coherent if and only if g is convex. Similar to SRM, the distortion risk measure can also recover CVaR by choosing the appropriate g.

Entropic risk measure (ERM) ERM adjusts the user's risk attitude through the exponential utility function. In particular, the ERM value of F with coefficient $\beta \neq 0$ is defined as

$$U_{\beta}(F) \triangleq \frac{1}{\beta} \log(\mathbb{E}_{X \sim F}[\exp(\beta X)]) = \frac{1}{\beta} \log\left(\int_{\mathbb{R}} \exp(\beta x) dF(x)\right).$$

Notably, ERM is the prime example of a convex risk measure which is not coherent (Rudloff et al., 2008).

Optimized certainty equivalent (OCE) The OCE (Ben-Tal and Teboulle, 2007) value of F associated with a utility function u is given by

$$C_u(F) \triangleq \sup_{\lambda} \left\{ \lambda + \mathbb{E}_{X \sim F}[u(X - \lambda)] \right\} = \sup_{\lambda} \left\{ \lambda + \int_{\mathbb{R}} u(x - \lambda) dF(x) \right\},$$

where u is a non-decreasing, closed utility function that satisfies u(0) = 0 and $1 \in \partial u(0)$. THE OCE is risk-averse (risk-seeking) if and only u is concave (convex). OCE subsumes important examples of popular risk measures, including the ERM and CVaR.

Cumulative Prospect Theory (CPT) CPT (Tversky and Kahneman, 1992; Prashanth and Bhat, 2022) takes the form:

$$C(F) \triangleq (F_Z) = \int_0^{+\infty} g^+ \left(1 - F_{u^+(Z)}(t)\right) dt - \int_0^{+\infty} g^- \left(1 - F_{u^-(Z)}(t)\right) dt$$

where $g^+, g^- : [0,1] \to [0,1], g^{+/-}(0) = 0$, and $g^{+/-}(1) = 1$. The functions $u^+, u^- : \mathbb{R} \to \mathbb{R}_+$ are continuous, with $u^+(z) = 0$ when $z \ge c$ and $u^-(z) = 0$ when z < c for some constant $c \in \mathbb{R}$. CPT handles gains and losses separately. The functions u^+, u^- compare the random variable Z to a baseline c, and the distortion g^+ is applied to "gains" (when $Z \ge c$), while g^- is applied to "losses" (when Z < c).

B.2 Lipschitz Property

We summarizes the Lipschitz constants of common risk measures over a finite interval [a, b] in Table 2. Prashanth and Bhat (2022) provides the Lipschitz constants of SRM, OCE, and distortion risk measure w.r.t. the Wasserstein distance or $\|\cdot\|_1$. Huang et al. (2021) provides the Lipschitz constants of distortion risk measure and CPT w.r.t. $\|\cdot\|_{\infty}$. In particular, Huang et al. (2021) identifies the Lipschitz constant to be $b \max(L_{g^+}, L_{g^-})$, where L_{g^+}, L_{g^-} are the Lipschitz constant of g^+ and g^- respectively. Note that OCE subsumes ERM and CVaR, and distortion risk measure encompasses PH and LB. For completeness, we will derive the Lipschitz constants of SRM and OCE w.r.t. $\|\cdot\|_{\infty}$ in the following. Fact 1 offers a simple way to derive the Lipschitz constant of a risk measure w.r.t. $\|\cdot\|_1$ based on that w.r.t. $\|\cdot\|_{\infty}$. Therefore, the Lipschitz constants of SRM w.r.t. $\|\cdot\|_{\infty}$ can take $L_{\infty}(M_{\phi}, [a, b]) = (b - a) \cdot L_1(M_{\phi}, [a, b]) = (b - a) \max |\phi(x)|$. As a special case, we have $L_{\infty}(C_{\alpha}, [0, M]) = \frac{b-a}{\alpha}$.

Fact 1. If a functional ρ has Lipschitz constant $L_1([a, b])$ over $\mathscr{D}([a, b])$, then it has Lipschitz constant $L_{\infty}([a, b]) = L_1([a, b])(b - a)$.

Proof. Suppose ρ has Lipschitz constant $L_1([a, b])$ over $\mathscr{D}([a, b])$, then

$$|\rho(F) - \rho(G)| \le L_1([a,b]) \|F - G\|_1 \le L_1([a,b]) \|F - G\|_\infty (b-a), \forall F, G \in \mathscr{D}([a,b]).$$

This implies that $L_{\infty}([a,b]) = L_1([a,b])(b-a)$ is a valid choice.

Fact 2. The Lipschitz constants of OCE w.r.t. $\|\cdot\|_{\infty}$ is $L_{\infty}(C_u, [a, b]) = -u(a - b)$ for concave utility function and $L_{\infty}(C_u, [a, b]) = u(b - a)$ for convex utility function.

Proof. Let $\lambda_1, \lambda_2 \in [a, b]$ satisfy

$$C_u(F) = \lambda_1 + \int_a^b u(x - \lambda_1) dF(x) = \max_{\lambda \in [a,b]} \lambda + \int_a^b u(x - \lambda) dF(x)$$

$$C_u(G) = \lambda_2 + \int_a^b u(x - \lambda_2) dG(x) = \max_{\lambda \in [a,b]} \lambda + \int_a^b u(x - \lambda) dG(x).$$

Without loss generality, we assume $C_u(F) > C_u(G)$. It holds that

$$\begin{split} C_u(F) - C_u(G) &= \lambda_1 + \int_a^b u(x - \lambda_1) dF(x) - \lambda_2 - \int_a^b u(x - \lambda_2) dG(x) \\ &\leq \lambda_1 + \int_a^b u(x - \lambda_1) dF(x) - \lambda_1 - \int_a^b u(x - \lambda_1) dG(x) \\ &= \int_a^b u(x - \lambda_1) dF(x) - \int_a^b u(x - \lambda_1) dG(x) \\ &= u(x - \lambda_1) F(x) |_a^b - \int_a^b F(x) du(x - \lambda_1) - u(x - \lambda_1) G(x) |_a^b + \int_a^b G(x) du(x - \lambda_1) \\ &= \int_a^b (G(x) - F(x)) du(x - \lambda_1) \\ &\leq \int_a^b du(x - \lambda_1) \cdot ||F - G||_{\infty} \\ &= (u(b - \lambda_1) - u(a - \lambda_1)) ||F - G||_{\infty} \\ &\leq \max_{\lambda \in [a,b]} (u(b - \lambda) - u(a - \lambda)) ||F - G||_{\infty} = L_{\infty}(C_u, [a,b]) ||F - G||_{\infty} \,, \end{split}$$

where the second inequality is due to that u is non-decreasing. For concave utility function, we can bound the last term as

$$\max_{\lambda \in [a,b]} (u(b-\lambda) - u(a-\lambda)) = u(b-b) - u(a-b) = -u(a-b)$$

For convex utility function, we can bound the last term as

$$\max_{\lambda \in [a,b]} (u(b-\lambda) - u(a-\lambda)) = u(b-a) - u(a-a) = u(b-a).$$

Fact 3. The Lipschitz constants of OCE w.r.t. $\|\cdot\|_1$ is $L_1(C_u, [a, b]) = u'(a - b)$ for concave utility function and $L_1(C_u, [a, b]) = u'(b - a)$ for convex utility function.

	OCE	CVaR	ERM	DisRM	PH	LB	CPT
$L_1([a,b])$	u'(a-b)	$\frac{1}{\alpha}$	$e^{ \beta (b-a)}$	$\max g'(x)$	pb^{p-1}	$\frac{q^2}{(q-1)e}$	$\max(L_{g^+}, L_{g^-})$
$L_{\infty}([a,b])$	-u(a-b)	$\frac{b-a}{\alpha}$	$\frac{e^{ \beta (b-a)}-1}{ \beta }$	$(b-a)\max g'(x)$	$p(b-a)b^{p-1}$	$\frac{(b-a)q^2}{(q-1)e}$	$b\max(L_{g^+}, L_{g^-})$

Table 2: Lipschitz constants of risk measures

Proof. Let $\lambda_1, \lambda_2 \in [a, b]$ satisfy

$$C_u(F) = \lambda_1 + \int_a^b u(x - \lambda_1) dF(x) = \max_{\lambda \in [a,b]} \lambda + \int_a^b u(x - \lambda) dF(x)$$
$$C_u(G) = \lambda_2 + \int_a^b u(x - \lambda_2) dG(x) = \max_{\lambda \in [a,b]} \lambda + \int_a^b u(x - \lambda) dG(x).$$

Without loss generality, we assume $C_u(F) > C_u(G)$. It holds that

$$\begin{aligned} C_u(F) - C_u(G) &= \lambda_1 + \int_a^b u(x - \lambda_1) dF(x) - \lambda_2 - \int_a^b u(x - \lambda_2) dG(x) \\ &\leq \int_a^b u(x - \lambda_1) dF(x) - \int_a^b u(x - \lambda_1) dG(x) \\ &= \int_a^b (G(x) - F(x)) du(x - \lambda_1) \\ &= \int_a^b (G(x) - F(x)) u'(x - \lambda_1) dx \\ &\leq \max_{\lambda \in [a,b], x \in [a,b]} u'(x - \lambda) \int_a^b |G(x) - F(x)| dx \\ &= L_1(C_u, [a,b]) \|F - G\|_1, \end{aligned}$$

where the second inequality is due to the non-negativity of u'. For concave utility function, we can bound the last term as

$$\max_{\lambda \in [a,b], x \in [a,b]} u'(x-\lambda) = u'(a-b)$$

For convex utility function, we can bound the last term as

$$\max_{\lambda \in [a,b], x \in [a,b]} u'(x-\lambda) = u'(b-a).$$

OCE subsumes ERM when $u(x) = \frac{\exp(\beta x) - 1}{\beta}$. In particular, $L_{\infty}(U_{\beta}, [a, b]) = -u(a - b) = -\frac{\exp(\beta(a-b)) - 1}{\beta} = \frac{\exp(|\beta|(b-a)) - 1}{|\beta|}$ for concave utility $(\beta < 0)$ and $L_{\infty}(U_{\beta}, [a, b]) = u(b - a) = \frac{\exp(\beta(b-a)) - 1}{\beta}$ for convex utility $(\beta > 0)$.

C Subroutine

We present more details about subroutine OM used in Algorithm 2 in this section. Fix an (s, a, k, k), OM takes the empirical model $\hat{P}_{h}^{k}(s, a)$, the value at the next step V_{h+1}^{k} , and a confidence radius $c_{h}^{k}(s, a)$ as input and outputs the optimistic model $\tilde{P}_{h}^{k}(s, a)$. For a PMF P and a real number c > 0, denote by $B_{1}(P, c) \triangleq \{P' | \|P' - P\|_{1} \leq c\}$ the ℓ_{1} norm ball centered at P with radius c. Recall that we $F \succeq G$ denotes that $F(x) \leq G(x), \forall x \in \mathbb{R}$. Lemma 2 shows that OM can output an optimistic model \tilde{P} whose value distribution dominates those generated by the model within the concentration ball.

Lemma 2. Let P, V, c be the input of OM and \tilde{P} be the output. It holds that

$$(\tilde{P}, V) \succeq (Q, V), \forall Q \in B_1(P, c).$$

Proof. For simplicity, let $P = (P_1, \dots, P_n), V \in \mathbb{R}^n$ satisfying $V_1 \leq V_2 \dots \leq V_n$. Observe that the CDF (P, V) is a piecewise constant function. Hence it suffices to show that

$$\sum_{j=1}^{i} \tilde{P}_j \le \sum_{j=1}^{i} Q_j, \forall i \in [n], \forall Q \in B_1(P,c).$$

Let $l \triangleq \min\left\{i \mid \sum_{j=1}^{i} P_j \ge \frac{c}{2}\right\}$. There are two cases.

Case 1: $P_n + \frac{c}{2} \leq 1$. Since $\sum_{j=1}^{l-1} P_j < \frac{c}{2}$ and $\sum_{j=1}^{l} P_j \geq \frac{c}{2}$, we have

$$\tilde{P}_{i} = \begin{cases} 0, i \in [l-1] \\ \sum_{j=1}^{l} P_{j} - \frac{c}{2}, i = l \\ P_{i}, l+1 \le i \le n-1 \\ P_{n} + \frac{c}{2}, i = n \end{cases}$$

and thus

$$\sum_{j=1}^{i} \tilde{P}_{j} = \begin{cases} 0, i \in [l-1] \\ \sum_{j=1}^{l} P_{j} - \frac{c}{2}, l \le i \le n-1 \\ 1, i = n \end{cases}$$

For any $Q \in B_1(P, c)$, it holds that

$$\sum_{j=1}^{i} \tilde{P}_j \le \sum_{j=1}^{i} Q_j, \forall i \in [n].$$

Otherwise $\sum_{j=1}^{k} Q_j < \sum_{j=1}^{k} P_j - \frac{c}{2}$ for some $l \leq k \leq n-1$, which implies $\sum_{j=k+1}^{n} Q_j = 1 - \sum_{j=1}^{k} Q_j > 1 - \sum_{j=1}^{k} P_j + \frac{c}{2} = \sum_{j=1}^{k} P_j + \frac{c}{2}$. This leads to a contradiction $||P - Q||_1 = \sum_{j \in [n]} |P_j - Q_j| \geq |\sum_{j=1}^{k} P_j - \sum_{j=1}^{k} Q_j| + |\sum_{j=k+1}^{n} P_j - \sum_{j=k+1}^{n} Q_j| > c$.

Case 2: $P_n + \frac{c}{2} > 1$. In this case, $\tilde{P}_j = 0$ for $j \in [n-1]$ and $\tilde{P}_n = 1$. It is obvious that

$$\sum_{j=1}^{i} \tilde{P}_j \le \sum_{j=1}^{i} Q_j, \forall i \in [n], \forall Q \in B_1(P,c).$$

Therefore, we have

$$(P, V) \succeq (Q, V), \forall Q \in B_1(P, c).$$

Lemma 2 together with the monotonicity of ρ_h implies that the output $\tilde{P}_h^k(s, a)$ satisfies

$$\rho_h(\tilde{P}_h^k(s,a), V_{h+1}^k) \ge \rho_h(P', V_{h+1}^k), \ \forall P' \in B_1(\hat{P}_h^k(s,a), c_h^k(s,a))$$

In Appendix D, we will show that $P_h(s,a) \in B_1(\hat{P}_h^k(s,a), c_h^k(s,a))$ with high probability. Suppose $V_{h+1}^k(s) \ge V_{h+1}^*(s), \forall s$. It follows that

$$Q_{h}^{k}(s,a) = r_{h}(s,a) + \rho_{h}(P_{h}^{k}(s,a), V_{h+1}^{k}) \ge r_{h}(s,a) + \rho_{h}(P_{h}(s,a), V_{h+1}^{k}) \ge r_{h}(s,a) + \rho_{h}(P_{h}(s,a), V_{h+1}^{*}) = Q_{h}^{*}(s,a), \forall (s,a).$$

The second inequality is due to the monotonicity of ρ_h together with the fact that

$$V_{h+1}^k \ge V_{h+1}^* \Longrightarrow (P_h(s,a), V_{h+1}^k) \succeq (P_h(s,a), V_{h+1}^*).$$

Then we have $V_h^k(s) = \max Q_h^k(s, a) \ge \max Q_h^*(s, a) = V_h^*(s), \forall s.$ By induction, we obtain

$$V_h^k(s) \ge V_h^*(s), \forall (k, h, s).$$

This implies that the value functions induced by the optimistic models are indeed optimistic compared to the optimal value functions. The computational complexity of OM is $O(S \log(S))$, since the computational complexity of each step is $O(S \log(S))$, O(S), and O(S).

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D Proofs of Regret Upper Bounds

D.1 Worst-case Regret Upper Bound

We first prove the worst-case regret upper bound for Algorithm 1.

D.1.1 Proof for Algorithm 1

Step 1: verify optimism. Fix an arbitrary $\delta \in (0, 1)$. Define the good event \mathcal{G}_{δ} as

$$\mathcal{G}_{\delta} \triangleq \left\{ \left\| \hat{P}_{h}^{k}(\cdot|s,a) - P_{h}(\cdot|s,a) \right\|_{1} \leq \sqrt{\frac{2S}{N_{h}^{k}(s,a) \vee 1}} \iota, \forall (s,a,k,h) \in \mathcal{S} \times \mathcal{A} \times [K] \times [H] \right\},$$

under which the empirical model concentrates around the true model under $\|\cdot\|_1$.

Lemma 3 (High probability good event). The event \mathcal{G}_{δ} holds with probability at least $1 - \delta$.

Fact 4 (ℓ_1 concentration bound, Weissman et al. (2003)). Let P be a probability distribution over a finite discrete measurable space (\mathcal{X}, Σ) . Let \hat{P}_n be the empirical distribution of P estimated from n samples. Then with probability at least $1 - \delta$,

$$\left\|\widehat{P}_n - P\right\|_1 \le \sqrt{\frac{2|\mathcal{X}|}{n}\log\frac{1}{\delta}}.$$

Lemma 3 does not directly follow from a union bound together with Fact 4 since the case $N_h^k(s, a) = 0$ need to be checked.

Proof. Fix some $(s, a, k, h) \in S \times A \times [K] \times [H]$. If $N_h^k(s, a) = 0$, then we have $\hat{P}_h^k(\cdot|s, a) = \frac{1}{S}\mathbf{1}$. A simple calculation yields that for any $P_h(\cdot|s, a)$

$$\left\|\frac{1}{S}\mathbf{1} - P_h(\cdot|s,a)\right\|_1 \le 2 \le \sqrt{2S\log(1/\delta)}.$$

It follows that

$$\mathbb{P}\left(\left\|\hat{P}_{h}^{k}(\cdot|s,a) - P_{h}(\cdot|s,a)\right\|_{1} \le \sqrt{\frac{2S}{N_{h}^{k}(s,a) \vee 1}\log(1/\delta)} \left|N_{h}^{k}(s,a) = 0\right) = 1 > 1 - \delta.$$

The event is true for the unseen state-action pairs. Now we consider the case that $N_h^k(s, a) > 0$. By Fact 4, we have that for any integer $n \ge 1$

$$\mathbb{P}\left(\left\|\hat{P}_{h}^{k}(\cdot|s,a) - P_{h}(\cdot|s,a)\right\|_{1} \le \sqrt{\frac{2S}{N_{h}^{k}(s,a)}\log(1/\delta)} \left|N_{h}^{k}(s,a) = n\right\} \ge 1 - \delta.$$

Thus we have

$$\begin{split} & \mathbb{P}\left(\left\|\hat{P}_{h}^{k}(\cdot|s,a) - P_{h}(\cdot|s,a)\right\|_{1} \leq \sqrt{\frac{2S\log(1/\delta)}{N_{h}^{k}(s,a)}}\right) \\ &= \sum_{n=0,1,\cdots} \mathbb{P}\left(\left\|\hat{P}_{h}^{k}(\cdot|s,a) - P_{h}(\cdot|s,a)\right\|_{1} \leq \sqrt{\frac{2S\log(1/\delta)}{N_{h}^{k}(s,a) \vee 1}}\right| N_{h}^{k}(s,a) = n\right) \mathbb{P}(N_{h}^{k}(s,a) = n) \\ &\geq (1-\delta) \sum_{n=0,1,\cdots} \mathbb{P}(N_{h}^{k}(s,a) = n) = 1-\delta. \end{split}$$

Applying a union bound over all (s, a, k, h) and rescaling δ leads to the result.

Lemma 4 (Range of V^*). For any MDP, it holds that $V_h^*(s) \in [0, H+1-h]$ for all $(s,h) \in \mathcal{S} \times [H+1]$.

Proof. The proof follows from induction and Assumption 1. Observe that $V_{H+1}^* = 0$. Suppose $V_{h+1}^*(s) \in [0, H-h]$ for any s, then we have

$$0 \le Q_h^*(s, a) = r_h(s, a) + \rho_h(V_{h+1}^*, P_h(s, a)) \le 1 + H - h,$$

where the inequalities are due to the Assumption 1. Then we have $V_h^*(s) = \max_a Q_h^*(s, a) \in [0, H + 1 - h]$. The induction is completed.

Fact 5 (DKW inequality for discrete distribution). Let \hat{P}_n be the empirical PMF for (x, P) with n samples, then w.p. at least $1 - \delta$

$$\left\| (x, P) - (x, \hat{P}_n) \right\|_{\infty} \le \sqrt{\frac{\log(2/\delta)}{2n}}.$$

We remark that we can also derive a bound by Fact 6: w.p. $1 - \delta$

$$\left\| (x,P) - (x,\hat{P}_n) \right\|_{\infty} \le \left\| P - \hat{P}_n \right\|_1 \le \sqrt{\frac{2m\log(2/\delta)}{n}}.$$

However, this bound is looser than that from Fact 5 with a factor of \sqrt{m} .

Lemma 5 (Optimistic value function). Conditioned on event \mathcal{G}_{δ} , the sequence $\{V_1^k(s_1^k)\}_{k \in [K]}$ produced by Algorithm 1 satisfies $V_1^k(s_1^k) \ge V_1^*(s_1^k), \forall k \in [K]$.

Proof. The proof follows from induction. Fix $k \in [K]$. It is evident that the inequality holds when h = H + 1. Suppose the inequality holds for h + 1. It follows that for any (s, a)

$$Q_{h}^{k}(s,a) = r_{h}(s,a) + \rho_{h} \left(V_{h+1}^{k}, \hat{P}_{h}^{k}(s,a) \right) + b_{h}^{k}(s,a)$$

$$\geq r_{h}(s,a) + \rho_{h} \left(V_{h+1}^{*}, \hat{P}_{h}^{k}(s,a) \right) + b_{h}^{k}(s,a)$$

$$\geq r_{h}(s,a) + \rho_{h}(V_{h+1}^{*}, P_{h}(s,a)) = Q_{h}^{*}(s,a).$$

The first inequality is due to the monotonicity of ρ_h and the induction hypothesis, and the second one follows from that

$$\rho_h(V_{h+1}^*, P_h(s, a)) - \rho_h(V_{h+1}^*, \hat{P}_h^k(s, a)) \le L_{\infty}(\rho_h, H - h) \left\| (V_{h+1}^*, P_h(s, a)) - \left(V_{h+1}^*, \hat{P}_h^k(s, a)\right) \right\|_{\infty} \le L_{\infty}(\rho_h, H - h) \sqrt{\frac{\iota}{2(N_h^k(s, a) \vee 1)}} = b_h^k(s, a),$$

where the first inequality follows from the Lipschitz property of ρ_h and Lemma 4, and the second one is due to the DKW inequality (Fact 5).

Fact 6. Let (x, P) and (x, Q) be two discrete distributions with the same support $x = (x_1, \dots, x_m)$ and F, G be their CDFs respectively. It holds that

$$||F - G||_{\infty} \le ||P - Q||_1.$$

Proof. Without loss of generality, we assume that $x_1 \leq x_2 \cdots \leq x_n$. By definition,

$$\|F - G\|_{\infty} = \sup_{x \in \mathbb{R}} |F(x) - G(x)| = \max_{i \in [n]} |F(x_i) - G(x_i)| = \max_{i \in [n]} \left| \sum_{j \in [i]} P_j - \sum_{j \in [i]} Q_j \right|$$

$$\leq \max_{i \in [n]} \sum_{j \in [i]} |P_j - Q_j| = \sum_{j \in [n]} |P_j - Q_j| = \|P - Q\|_1.$$

The second equality is due to that F and G are piecewise constant functions that only differ at x_1, \dots, x_n . This would lead a worse bonus term with a factor of \sqrt{S} .

Remark 4. Alternatively, we have

holds that

$$\rho_{h}(V_{h+1}^{*}, P_{h}(s, a)) - \rho_{h}(V_{h+1}^{*}, \hat{P}_{h}^{k}(s, a)) \leq L_{\infty}(\rho_{h}, H - h) \left\| (V_{h+1}^{*}, P_{h}(s, a)) - (V_{h+1}^{*}, \hat{P}_{h}^{k}(s, a)) \right\|_{\infty} \\ \leq L_{\infty}(\rho_{h}, H - h) \left\| P_{h}(s, a) - \hat{P}_{h}^{k}(s, a) \right\|_{1} \\ \leq L_{\infty}(\rho_{h}, H - h) \sqrt{\frac{2S}{(N_{h}^{k}(s, a) \vee 1)}} \iota,$$

where the second inequality is due to Fact 6, the third inequality is due to Lemma 3.

Step 2: regret decomposition. We introduce the key technical lemma here. **Lemma 6.** Let (x, P) and (y, P) be two discrete distributions, where $x = (x_1, \dots, x_n)$ and $y = (y_1, \dots, y_n)$. It

$$||(x, P) - (y, P)||_1 \le \sum_{i \in [n]} P_i |x_i - y_i|.$$

Proof. By the definition of Wasserstein distance between two discrete distributions, we have

$$\begin{aligned} \|F - G\|_1 &= \inf_{\sum_j \lambda_{i,j} = P_i, \sum_i \lambda_{i,j} = P_j} \sum_i \sum_j \lambda_{i,j} |x_i - y_j| \\ &\leq \sum_i \sum_j \delta_{i,j} P_i |x_i - y_j| \\ &= \sum_i P_i \sum_j \delta_{i,j} |x_i - y_i| \\ &= \sum_i P_i |x_i - y_i| . \end{aligned}$$

The inequality holds since $\{\delta_{i,j}P_i\}_{i,j}$ is a valid coupling

$$\sum_{j} \delta_{i,j} P_i = P_i, \ \sum_{i} \delta_{i,j} P_i = P_j.$$

We define $\Delta_h^k \triangleq V_h^k - V_h^{\pi^k} \in [-(H+1-h), H+1-h]^S$ and $\delta_h^k \triangleq \Delta_h^k(s_h^k)$. For any (s,h) and any π , we let $P_h^{\pi}(\cdot|s) \triangleq P_h(\cdot|s, \pi_h(s))$. The regret can be bounded as

$$\operatorname{Regret}(K) = \sum_{k=1}^{K} V_1^*(s_1^k) - V_1^{\pi^k}(s_1^k) = \sum_{k=1}^{K} V_1^*(s_1^k) - V_1^k(s_1^k) + V_1^k(s_1^k) - V_1^{\pi^k}(s_1^k)$$
$$\leq \sum_{k=1}^{K} V_1^k(s_1^k) - V_1^{\pi^k}(s_1^k) = \sum_{k=1}^{K} \delta_1^k.$$

For simplicity, we write $r_h^k \triangleq r_h(s_h^k, \pi_h^k(s_h^k)), \ b_h^k \triangleq b_h^k(s_h^k, \pi_h^k(s_h^k)), \ N_h^k \triangleq N_h^k(s_h^k, \pi_h^k(s_h^k))$ and $\hat{P}_h^k(s_h^k) \triangleq \hat{P}_h^k(s_h^k, \pi_h^k(s_h^k))$. For any $h \in [H-1]$, we decompose δ_h^k as follows

$$\delta_{h}^{k} = \rho_{h} \left(V_{h+1}^{k}, \hat{P}_{h}^{k}(s_{h}^{k}) \right) + b_{h}^{k} - \rho_{h} \left(V_{h+1}^{\pi^{k}}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) \\ = \underbrace{\rho_{h} \left(V_{h+1}^{k}, \hat{P}_{h}^{k}(s_{h}^{k}) \right) - \rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(a)} + \underbrace{\rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) - \rho_{h} \left(V_{h+1}^{\pi^{k}}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(b)} + b_{h}^{k}.$$

Using the Lipschitz property of ρ_h ,

$$(a) \leq L_{\infty}(\rho_{h}, H - h) \left\| \left(V_{h+1}^{k}, \hat{P}_{h}^{k}(s_{h}^{k}) \right) - \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) \right\|_{\infty}$$

$$\leq L_{\infty}(\rho_{h}, H - h) \left\| \hat{P}_{h}^{k}(s_{h}^{k}) - P_{h}^{\pi^{k}}(s_{h}^{k}) \right\|_{1}$$

$$\leq L_{\infty}(\rho_{h}, H - h) \sqrt{\frac{2S}{N_{h}^{k} \vee 1}} \iota.$$

Applying Lemma 6 yields that

$$\begin{aligned} (b) &\leq L_1(\rho_h, H-h) \left\| \left(V_{h+1}^k, P_h^{\pi^k}(s_h^k) \right) - \left(V_{h+1}^{\pi^k}, P_h^{\pi^k}(s_h^k) \right) \right\|_1 \\ &\leq L_1(\rho_h, H-h) \sum_{s' \in \mathcal{S}} P_h^{\pi^k}(s'|s_h^k) \left| V_{h+1}^k(s') - V_{h+1}^{\pi^k}(s') \right| \\ &= L_1(\rho_h, H-h) \sum_{s' \in \mathcal{S}} P_h^{\pi^k}(s'|s_h^k) \left(V_{h+1}^k(s') - V_{h+1}^{\pi^k}(s') \right) \\ &= L_1(\rho_h, H-h) \left[P_h^{\pi^k} \Delta_{h+1}^k \right] (s_h^k) \\ &\triangleq L_1(\rho_h, H-h) (\epsilon_h^k + \delta_{h+1}^k), \end{aligned}$$

where $\epsilon_h^k \triangleq [P_h^{\pi^k} \Delta_{h+1}^k](s_h^k) - \Delta_{h+1}^k(s_{h+1}^k)$ is a martingale difference sequence with $\epsilon_h^k \in [-2(H-h), 2(H-h)]$ a.s. for all $(k,h) \in [K] \times [H]$. The first equality is due to that $V_{h+1}^k(s') \ge V_{h+1}^*(s') \ge V_{h+1}^{\pi^k}(s')$ for all s'. Now we can bound δ_h^k recursively

$$\delta_{h}^{k} \leq L_{\infty}(\rho_{h}, H-h) \sqrt{\frac{2S}{N_{h}^{k} \vee 1}} \iota + L_{1}(\rho_{h}, H-h)(\epsilon_{h}^{k} + \delta_{h+1}^{k}) + L_{\infty}(\rho_{h}, H-h) \sqrt{\frac{\iota}{2(N_{h}^{k} \vee 1)}} \\ \leq 2L_{\infty}(\rho_{h}, H-h)e_{h}^{k} + L_{1}(\rho_{h}, H-h)(\epsilon_{h}^{k} + \delta_{h+1}^{k}),$$

where we define $e_h^k \triangleq \sqrt{\frac{2S}{N_h^k \vee 1} \iota}$ in the last line. Repeating the procedure, we obtain

$$\begin{split} \delta_1^k &\leq 2\sum_{h=1}^{H-1} L_{\infty}(\rho_h, H-h) \prod_{i=1}^{h-1} L_1(\rho_i, H-i) e_h^k + \sum_{h=1}^{H-1} \prod_{i=1}^h L_1(\rho_i, H-i) \epsilon_h^k + \prod_{h=1}^{H-1} L_1(\rho_h, H-h) \delta_H^k \\ &= 2\sum_{h=1}^{H-1} L_{\infty}(\rho_h, H-h) \prod_{i=1}^{h-1} L_1(\rho_i, H-i) e_h^k + \sum_{h=1}^{H-1} \prod_{i=1}^h L_1(\rho_i, H-i) \epsilon_h^k, \end{split}$$

where the last step is because $\delta_H^k = Q_H^k - Q_H^* = r_H - r_H = 0.$

Step 3: putting together. The total regret is bounded as

$$\operatorname{Regret}(K) \le \sum_{k \in [K]} \delta_1^k \le 2 \sum_{h=1}^{H-1} L_{\infty}(\rho_h, H-h) \prod_{i=1}^{h-1} L_1(\rho_i, H-i) \sum_{k=1}^K e_h^k + \sum_{k=1}^K \sum_{h=1}^{H-1} \prod_{i=1}^h L_1(\rho_i, H-i) \epsilon_h^k$$

The first term can be bounded as

$$2\sum_{h=1}^{H-1} L_{\infty}(\rho_{h}, H-h) \prod_{i=1}^{h-1} L_{1}(\rho_{i}, H-i) \sum_{k=1}^{K} e_{h}^{k} = 2\sum_{h=1}^{H-1} L_{\infty}(\rho_{h}, H-h) \prod_{i=1}^{h-1} L_{1}(\rho_{i}, H-i) \sum_{k=1}^{K} \sqrt{\frac{2S}{N_{h}^{k} \vee 1}} U_{k}$$

$$\leq 4\sum_{h=1}^{H-1} L_{\infty}(\rho_{h}, H-h) \prod_{i=1}^{h-1} L_{1}(\rho_{i}, H-i) \sqrt{S^{2}AK\iota}$$

$$\triangleq 4\sum_{h=1}^{H-1} L_{\infty,h} \prod_{i=1}^{h-1} L_{1,i} \sqrt{S^{2}AK\iota}$$

$$\triangleq 4\sum_{h=1}^{H-1} L_{\infty,h} \tilde{L}_{1,h-1} \sqrt{S^{2}AK\iota},$$

where we denote by $L_{\infty,h} = L_{\infty}(\rho_h, H - h)$ and $\tilde{L}_{1,h-1} = \prod_{i=1}^{h-1} L_{1,i}$ for simplicity. We can bound the second term by Azuma-Hoeffding inequality: with probability at least $1 - \delta'$, the following holds

$$\sum_{k=1}^{K} \sum_{h=1}^{H-1} \prod_{i=1}^{h} L_1(\rho_i, H-i)\epsilon_h^k = \sum_{k=1}^{K} \sum_{h=1}^{H-1} \tilde{L}_{1,h}\epsilon_h^k \le \sqrt{\sum_{k=1}^{K} \sum_{h=1}^{H-1} \frac{(2(H-h)\tilde{L}_{1,h})^2}{2} \log(1/\delta')}$$
$$= \sqrt{\sum_{h=1}^{H-1} (H-h)^2 \tilde{L}_{1,h}^2} \sqrt{2K \log(1/\delta')}$$

Using a union bound and let $\delta = \delta' = \frac{\tilde{\delta}}{2}$, we have that with probability at least $1 - \delta$,

$$\operatorname{Regret}(K) \le 4 \sum_{h=1}^{H-1} L_{\infty,h} \tilde{L}_{1,h-1} \sqrt{S^2 A K \iota} + \sqrt{\sum_{h=1}^{H-1} (H-h)^2 \tilde{L}_{1,h}^2 \sqrt{2K \log(1/\delta')}} \\ = \tilde{\mathcal{O}}\left(\sum_{h=1}^{H-1} L_{\infty,h} \tilde{L}_{1,h-1} \sqrt{S^2 A K}\right).$$

The equality is due to that

$$\sum_{h=1}^{H-1} L_{\infty,h} \tilde{L}_{1,h-1} \ge \sqrt{\sum_{h=1}^{H-1} L_{\infty,h}^2 \tilde{L}_{1,h-1}^2} = \sqrt{\sum_{h=1}^{H-1} ((H-h)L_{1,h})^2 \tilde{L}_{1,h-1}^2} = \sqrt{\sum_{h=1}^{H-1} ((H-h)^2 \tilde{L}_{1,h}^2)},$$

where the first inequality comes from the non-negativity of $L_{\infty,h}\tilde{L}_{1,h-1}$, and the first equality is due to the choice $L_{\infty,h} = L_{1,h}(H-h)$.

Remark 5. The following statement is not true

$$||(x,P) - (y,P)||_1 \le \left| \sum_{i \in [n]} P_i(x_i - y_i) \right|.$$

Consider the case that $(x, P) = ((0, 1), (\frac{1}{3}, \frac{2}{3}) \text{ and } (y, P) = ((\frac{1}{3}, \frac{5}{6}), (\frac{1}{3}, \frac{2}{3}))$. A simple calculation yields that $\sum_{i \in [n]} P_i(x_i - y_i) = 0$.

D.1.2 Proof for Algorithm 2

Step 1: verify optimism.

Lemma 7 (Optimistic value function). Conditioned on event \mathcal{G}_{δ} , the sequence $\{V_1^k(s_1^k)\}_{k \in [K]}$ produced by Algorithm 2 satisfies $V_1^k(s_1^k) \ge V_1^*(s_1^k), \forall k \in [K]$.

Proof. The proof follows from Appendix C.

Step 2: regret decomposition. The regret can be bounded as

$$\operatorname{Regret}(K) = \sum_{k=1}^{K} V_1^*(s_1^k) - V_1^{\pi^k}(s_1^k) \le \sum_{k=1}^{K} V_1^k(s_1^k) - V_1^{\pi^k}(s_1^k) = \sum_{k=1}^{K} \delta_1^k.$$

For any $h \in [H-1]$, we decompose δ_h^k as follows

$$\delta_{h}^{k} = \rho_{h} \left(V_{h+1}^{k}, \tilde{P}_{h}^{k}(s_{h}^{k}) \right) - \rho_{h} \left(V_{h+1}^{\pi^{k}}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) \\ = \underbrace{\rho_{h} \left(V_{h+1}^{k}, \tilde{P}_{h}^{k}(s_{h}^{k}) \right) - \rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(a)} + \underbrace{\rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) - \rho_{h} \left(V_{h+1}^{\pi^{k}}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(b)} + \underbrace{\rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) - \rho_{h} \left(V_{h+1}^{\pi^{k}}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(b)} + \underbrace{\rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) - \rho_{h} \left(V_{h+1}^{\pi^{k}}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(b)} + \underbrace{\rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) - \rho_{h} \left(V_{h+1}^{\pi^{k}}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(b)} + \underbrace{\rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) - \rho_{h} \left(V_{h+1}^{\pi^{k}}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(b)} + \underbrace{\rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) - \rho_{h} \left(V_{h+1}^{\pi^{k}}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(b)} + \underbrace{\rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) - \rho_{h} \left(V_{h+1}^{\pi^{k}}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(b)} + \underbrace{\rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) - \rho_{h} \left(V_{h+1}^{\pi^{k}}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(b)} + \underbrace{\rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(b)} - \underbrace{\rho_{h} \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right)}_{(b)} + \underbrace{\rho_{h} \left(V_{h}^{k}, P_{h}^{\pi^$$

Using the Lipschitz property of ρ_h ,

$$\begin{aligned} (a) &\leq L_{\infty}(\rho_{h}, H-h) \left\| \left(V_{h+1}^{k}, \tilde{P}_{h}^{k}(s_{h}^{k}) \right) - \left(V_{h+1}^{k}, P_{h}^{\pi^{k}}(s_{h}^{k}) \right) \right\|_{\infty} \\ &\leq L_{\infty}(\rho_{h}, H-h) \left\| \tilde{P}_{h}^{k}(s_{h}^{k}) - P_{h}^{\pi^{k}}(s_{h}^{k}) \right\|_{1} \\ &\leq L_{\infty}(\rho_{h}, H-h) \left(\left\| \tilde{P}_{h}^{k}(s_{h}^{k}) - \hat{P}_{h}^{\pi^{k}}(s_{h}^{k}) \right\|_{1} + \left\| \hat{P}_{h}^{k}(s_{h}^{k}) - P_{h}^{\pi^{k}}(s_{h}^{k}) \right\|_{1} \right) \\ &\leq 2L_{\infty}(\rho_{h}, H-h) \sqrt{\frac{2S}{N_{h}^{k} \vee 1}} \iota. \end{aligned}$$

Using arguments similar to the proof for Algorithm 1

$$(b) \le L_1(\rho_h, H-h)(\epsilon_h^k + \delta_{h+1}^k),$$

Now we can bound δ_h^k recursively

$$\delta_{h}^{k} \leq 2L_{\infty}(\rho_{h}, H-h) \sqrt{\frac{2S}{N_{h}^{k} \vee 1}} + L_{1}(\rho_{h}, H-h)(\epsilon_{h}^{k} + \delta_{h+1}^{k})$$
$$= 2L_{\infty}(\rho_{h}, H-h)\epsilon_{h}^{k} + L_{1}(\rho_{h}, H-h)(\epsilon_{h}^{k} + \delta_{h+1}^{k}).$$

Repeating the procedure, we obtain

$$\delta_1^k \le 2\sum_{h=1}^{H-1} L_{\infty}(\rho_h, H-h) \prod_{i=1}^{h-1} L_1(\rho_i, H-i) e_h^k + \sum_{h=1}^{H-1} \prod_{i=1}^h L_1(\rho_i, H-i) \epsilon_h^k.$$

Step 3: putting together. The results follows from analogous arguments of the proof for Algorithm 1.

D.2 Gap-dependent Regret Upper Bound

Step 1: regret decomposition. The regret of each episode can be rewritten as the expected sum of suboptimality gaps for each action:

$$(V_1^* - V_1^{\pi^k})(s_1^k) = V_1^*(s_1^k) - Q_1^*(s_1^k, a_1^k) + (Q_1^* - Q_1^{\pi^k})(s_1^k, a_1^k)$$

= $\Delta_1(s_1^k, a_1^k) + [P_2(V_2^* - V_2^{\pi^k})](s_2^k, a_2^k)$
= $\dots = \mathbb{E}\left[\sum_{h=1}^H \Delta_h(s_h^k, a_h^k)\right].$

Step 2: optimism.

Lemma 8. With probability at least $1 - \delta$, the following event holds

$$0 \le (Q_h^k - Q_h^*)(s, a) \le 2b_h^k(s, a) + L_{1,h}[P_h(V_{h+1}^k - V_{h+1}^*)](s, a).$$

Proof.

$$\begin{aligned} &(Q_{h}^{k}-Q_{h}^{*})(s,a)=r_{h}(s,a)+\rho_{h}\left(V_{h+1}^{k},\hat{P}_{h}^{k}(s,a)\right)+b_{h}^{k}(s,a)-r_{h}(s,a)-\rho_{h}\left(V_{h+1}^{*},P_{h}(s,a)\right)\\ &=\underbrace{\rho_{h}\left(V_{h+1}^{k},\hat{P}_{h}^{k}(s,a)\right)-\rho_{h}\left(V_{h+1}^{k},P_{h}(s,a)\right)}_{(a)}+\underbrace{\rho_{h}\left(V_{h+1}^{k},P_{h}(s,a)\right)-\rho_{h}\left(V_{h+1}^{*},P_{h}(s,a)\right)}_{(b)}+b_{h}^{k}(s,a)\\ &\leq L_{\infty,h}\left\|\left(V_{h+1}^{k},\hat{P}_{h}^{k}(s,a)\right)-\left(V_{h+1}^{k},P_{h}(s,a)\right)\right\|_{\infty}+L_{1,h}\left\|\left(V_{h+1}^{k},P_{h}(s,a)\right)-\left(V_{h+1}^{*},P_{h}(s,a)\right)\right\|_{1}+b_{h}^{k}(s,a)\\ &\leq L_{\infty,h}\left\|\hat{P}_{h}^{k}(s,a)-V_{h+1}^{k},P_{h}(s,a)\right\|_{1}+L_{1,h}[P_{h}(V_{h+1}^{k}-V_{h+1}^{*})](s,a)+b_{h}^{k}(s,a)\\ &\leq 2b_{h}^{k}(s,a)+L_{1,h}[P_{h}(V_{h+1}^{k}-V_{h+1}^{*})](s,a)\end{aligned}$$

Step 3: bound number of steps in each interval

Lemma 9. For any $n \in [N]$,

$$C^{n} \triangleq \left| \left\{ (k,h) : (Q_{h}^{k} - Q_{h}^{*})(s_{h}^{k}, a_{h}^{k}) \in [2^{n-1}\Delta_{\min}, 2^{n}\Delta_{\min}) \right\} \right| \le \mathcal{O}\left(\frac{HS^{2}A\iota \left(\sum_{h'=h}^{H-1} \prod_{i=h}^{h'-1} L_{1,i}L_{\infty,h'}\right)^{2}}{4^{n}\Delta_{\min}^{2}} \right).$$

Proof. For every $n \in [N]$, $h \in [H]$, define

$$w_k^{(n,h)} \triangleq \mathbb{I}\left\{ (Q_h^k - Q_h^*)(s_h^k, a_h^k) \in [2^{n-1}\Delta_{\min}, 2^n \Delta_{\min}) \right\}$$
$$C^{(n,h)} \triangleq \sum_{k=1}^K w_k^{(n,h)}.$$

Observe that $w_k^{(n,h)} \leq 1$ and $(w_k^{(n,h)})^2 = w_k^{(n,h)}$. Now we bound $\sum_{k=1}^K w_k^{(n,h)} (Q_h^k - Q_h^*) (s_h^k, a_h^k)$ from both sides. On the one hand, by Lemma ,

$$\begin{split} \sum_{k=1}^{K} w_{k}^{(n,h)} (Q_{h}^{k} - Q_{h}^{*}) (s_{h}^{k}, a_{h}^{k}) &\leq 4\sqrt{S^{2}A\iota C^{(n,h)}} \cdot \sum_{h'=h}^{H-1} \prod_{i=h}^{h'-1} L_{1,i} L_{\infty,h'} + \sqrt{2C^{(n,h)} \log \frac{1}{\delta'}} \cdot \sum_{h'=h}^{H-1} \prod_{i=h}^{h'-1} L_{1,i} L_{1,h'} (H-h') \\ &= \mathcal{O}\left(\sqrt{S^{2}A\iota C^{(n,h)}} \cdot \sum_{h'=h}^{H-1} \prod_{i=h}^{h'-1} L_{1,i} L_{\infty,h'}\right). \end{split}$$

On the other hand, by the definition of $w_k^{(n,h)}$,

$$\sum_{k=1}^{K} w_k^{(n,h)} (Q_h^k - Q_h^*) (s_h^k, a_h^k) \ge \sum_{k=1}^{K} w_k^{(n,h)} 2^{n-1} \Delta_{\min} = 2^{n-1} \Delta_{\min} \cdot C^{(n,h)}.$$

Combining the two inequalities, we obtain

$$C^{(n,h)} \leq \mathcal{O}\left(\frac{S^2 A\iota \left(\sum_{h'=h}^{H-1} \prod_{i=h}^{h'-1} L_{1,i} L_{\infty,h'}\right)^2}{4^n \Delta_{\min}^2}\right)$$

Finally, we have

$$C^{(n)} = \sum_{h=1}^{H} C^{(n,h)} \le \mathcal{O}\left(\frac{S^2 A \iota \sum_{h=1}^{H} \left(\sum_{h'=h}^{H-1} \prod_{i=h}^{h'-1} L_{1,i} L_{\infty,h'}\right)^2}{4^n \Delta_{\min}^2}\right) \le \mathcal{O}\left(\frac{S^2 A \iota H \left(\sum_{h'=1}^{H-1} \tilde{L}_{1,h'-1} L_{\infty,h'}\right)^2}{4^n \Delta_{\min}^2}\right)$$

Lemma 10. For any positive sequence $\{w_k\}_{k \in [K]}$, it holds that for any $h \in [H]$

$$\sum_{k=1}^{K} w_k (Q_h^k - Q_h^*) (s_h^k, a_h^k) \le 4 \sqrt{wS^2 A \iota \sum_{k=1}^{K} w_k} \cdot \sum_{h'=h}^{H-1} \prod_{i=h}^{h'-1} L_{1,i} L_{\infty,h'} + \sqrt{2 \sum_{k=1}^{K} w_k^2 \log \frac{1}{\delta'}} \cdot \sum_{h'=h}^{H-1} \prod_{i=h}^{h'-1} L_{1,i} L_{1,h'} (H - h').$$

Proof. By Lemma 5,

$$\begin{split} \sum_{k=1}^{K} w_k (Q_h^k - Q_h^*) (s_h^k, a_h^k) &\leq \sum_{k=1}^{K} w_k \left(2L_{\infty,h} \sqrt{\frac{2S\iota}{N_h^k}} + L_{1,h} [P_h (V_{h+1}^k - V_{h+1}^*)] (s_h^k, a_h^k) \right) \\ &= \underbrace{2L_{\infty,h} \sum_{k=1}^{K} w_k \sqrt{\frac{2S\iota}{N_h^k \vee 1}}}_{(a)} + \underbrace{L_{1,h} \sum_{k=1}^{K} w_k \epsilon_h^k}_{(b)} + L_{1,h} \sum_{k=1}^{K} w_k (V_{h+1}^k - V_{h+1}^*) (s_{h+1}^k) \\ &\leq (a) + (b) + L_{1,h} \sum_{k=1}^{K} w_k (Q_{h+1}^k - Q_{h+1}^*) (s_{h+1}^k, a_{h+1}^k), \end{split}$$

where $\epsilon_h^k \triangleq [P_h(V_{h+1}^k - V_{h+1}^*)](s_h^k, a_h^k) - (V_{h+1}^k - V_{h+1}^*)](s_{h+1}^k) \in [-2(H-h), 2(H-h)]$ is a martingale difference sequence w.r.t. \mathcal{F}_h^k for any $h \in [H]$, i.e., $\mathbb{E}\left[\epsilon_h^k | \mathcal{F}_h^k\right] = 0$. Define $k(s, a, t) \triangleq \min\{k : N_h^k(s, a) \ge t\}$ the episode when (s, a) is visited t times at step h. We can bound term (a) as

$$\begin{aligned} (a) &= 2L_{\infty,h} \sum_{k=1}^{K} w_k \sqrt{\frac{2S\iota}{N_h^k}} = 2L_{\infty,h} \sqrt{2S\iota} \sum_{s,a} \sum_{k=1}^{K} \mathbb{I}\{(s_h^k, a_h^k) = (s,a)\} \frac{w_k}{\sqrt{N_h^k(s,a) \vee 1}} \\ &= 2L_{\infty,h} \sqrt{2S\iota} \sum_{s,a} \sum_{t=1}^{N_h^K(s,a)} \frac{w_{k(s,a,t)}}{\sqrt{t}} \\ &\leq 2L_{\infty,h} \sqrt{2S\iota} \sum_{s,a} \sum_{t=1}^{C_{s,a}/w} \frac{w}{\sqrt{t}} \\ &\leq 4L_{\infty,h} \sqrt{S\iota} \sum_{s,a} \sqrt{C_{s,a}w} \\ &\leq 4L_{\infty,h} \sqrt{wS^2A\iota} \sum_{k=1}^{K} w_k, \end{aligned}$$

where $C_{s,a} \triangleq \sum_{t=1}^{N_h^K(s,a)} w_{k(s,a,t)}$ and $w_k \leq w$ for any k, and the last inequality follows from that $\sum_{s,a} C_{s,a} = \sum_{s,a} \sum_{t=1}^{N_h^K(s,a)} w_{k(s,a,t)} = \sum_{k=1}^K w_k$.

Since $\{\epsilon_h^k\}_{k \in [K]}$ is a MDS with $|\epsilon_h^k| \leq 2(H-h)$, we can bound term (b) by Azuma-Hoeffding inequality: w.p. $1-\delta'$

$$(b) = L_{1,h} \sum_{k=1}^{K} w_k \epsilon_h^k \le L_{1,h} (H-h) \sqrt{2 \sum_{k=1}^{K} w_k^2 \log \frac{1}{\delta'}}.$$

Thus we can get a recursive bound

$$\sum_{k=1}^{K} w_k (Q_h^k - Q_h^*) (s_h^k, a_h^k) \le 4L_{\infty,h} \sqrt{wS^2 A\iota \sum_{k=1}^{K} w_k} + L_{1,h} (H-h) \sqrt{2\sum_{k=1}^{K} w_k^2 \log \frac{1}{\delta'}} + L_{1,h} \sum_{k=1}^{K} w_k (Q_{h+1}^k - Q_{h+1}^*) (s_{h+1}^k, a_{h+1}^k).$$

Unrolling the inequality yields

$$\sum_{k=1}^{K} w_k (Q_h^k - Q_h^*) (s_h^k, a_h^k) \le \sum_{h'=h}^{H-1} \prod_{i=h}^{h'-1} L_{1,i} \left(4L_{\infty,h'} \sqrt{wS^2 A\iota} \sum_{k=1}^K w_k + L_{1,h'} (H - h') \sqrt{2\sum_{k=1}^K w_k^2 \log \frac{1}{\delta'}} \right)$$
$$= 4\sqrt{wS^2 A\iota} \sum_{k=1}^K w_k \cdot \sum_{h'=h}^{H-1} \prod_{i=h}^{h'-1} L_{1,i} L_{\infty,h'} + \sqrt{2\sum_{k=1}^K w_k^2 \log \frac{1}{\delta'}} \cdot \sum_{h'=h}^{H-1} \prod_{i=h}^{h'-1} L_{1,i} L_{1,h'} (H - h')$$

Step 4: Bound the regret Denote by $\tau \triangleq (s_h^k, a_h^k)_{k,h}$ the trajectory. Define $\operatorname{clip}[x|\delta] \triangleq x\mathbb{I}\{x \ge \delta\}$. Observe that

$$V_{h}^{*}(s_{h}^{k}) = \max_{a} Q_{h}^{*}(s_{h}^{k}, a) \le \max_{a} Q_{h}^{k}(s_{h}^{k}, a) = Q_{h}^{k}(s_{h}^{k}, a_{h}^{k}),$$

thus we get

$$\Delta_h(s_h^k, a_h^k) = \operatorname{clip}[V_h^*(s_h^k) - Q_h^*(s_h^k, a_h^k) | \Delta_{\min}] \le \operatorname{clip}[(Q_h^k - Q_h^*)(s_h^k, a_h^k) | \Delta_{\min}]$$

$$\begin{aligned} \operatorname{Regret}(K) &= \mathbb{E}\left[\sum_{k=1}^{K}\sum_{h=1}^{H}\Delta_{h}(s_{h}^{k},a_{h}^{k})\right] = \sum \mathbb{P}(\tau)\sum_{k=1}^{K}\sum_{h=1}^{H}\Delta_{h}(s_{h}^{k},a_{h}^{k}|\tau) \\ &\leq \sum_{\tau \in E} \mathbb{P}(\tau)\sum_{k=1}^{K}\sum_{h=1}^{H}\operatorname{clip}[(Q_{h}^{k}-Q_{h}^{*})(s_{h}^{k},a_{h}^{k}|\tau)|\Delta_{\min}] + \sum_{\tau \in E^{c}}\mathbb{P}(\tau)KH^{2} \\ &\leq \mathbb{P}(E)\sum_{n=1}^{N}2^{n}\Delta_{\min}C^{(n)} + \mathbb{P}(E^{c})KH^{2} \\ &\leq \sum_{n=1}^{N}\mathcal{O}\left(\frac{HS^{2}A\iota\left(\sum_{h'=h}^{H-1}\prod_{i=h}^{h'-1}L_{1,i}L_{\infty,h'}\right)^{2}}{2^{n}\Delta_{\min}}\right) + H \\ &= \mathcal{O}\left(\frac{HS^{2}A\iota\left(\sum_{h'=h}^{H-1}\prod_{i=h}^{h'-1}L_{1,i}L_{\infty,h'}\right)^{2}}{\Delta_{\min}}\right).\end{aligned}$$

E Proofs of Regret Lower Bounds

E.1 Minimax Lower Bound

We make the following assumption Domingues et al. (2021).

Assumption 2. Assume $S \ge 6, A \ge 2$, and there exists an integer d such that $S = 3 + \frac{A^d - 1}{A - 1}$. We further assume that $H \ge 3d$ and $\bar{H} \triangleq \frac{H}{3} \ge 1$.

Theorem 5. Assume Assumption 2 holds. For any algorithm \mathscr{A} , there exists an MDP $\mathcal{M}_{\mathscr{A}}$ such that for sufficiently large K

$$\mathbb{E}[Regret(\mathscr{A}, \mathcal{M}_{\mathscr{A}}, K)] \geq \frac{\sqrt{p}}{27\sqrt{6}} c_{\rho,1} H \sqrt{SAT}.$$

Step 1. Fix an arbitrary algorithm \mathscr{A} . We introduce three types of special states for the hard MDP class: a waiting state s_w where the agent starts and may stay until stage \bar{H} , after that it has to leave; a good state s_g , which is absorbing and is the only rewarding state; a bad state s_b that is absorbing and provides no reward. The rest of S-3 states are part of a A-ary tree of depth d-1. The agent can only arrive s_w from the root node s_{root} and can only reach s_g and s_b from the leaves of the tree. Let $\bar{H} \in [H-d]$ be the first parameter of the MDP class. We define $\tilde{H} := \bar{H} + d + 1$ and $H' := H + 1 - \tilde{H}$. We denote by $\mathcal{L} := \{s_1, s_2, ..., s_{\bar{L}}\}$ the set of \bar{L} leaves of the tree. For each $u^* := (h^*, \ell^*, a^*) \in [d+1: \bar{H} + d] \times \mathcal{L} \times \mathcal{A}$, we define an MDP \mathcal{M}_{u^*} as follows. The

transitions in the tree are deterministic, hence taking action a in state s results in the a-th child of node s. The transitions from s_w are defined as

$$P_h(s_w \mid s_w, a) := \mathbb{I}\{a = a_w, h \le \overline{H}\}$$
 and $P_h(s_{root} \mid s_w, a) := 1 - P_h(s_w \mid s_w, a)$.

The transitions from any leaf $s_i \in \mathcal{L}$ are specified as

$$P_h(s_g \mid s_i, a) := p + \Delta_{u^*}(h, s_i, a)$$
 and $P_h(s_b \mid s_i, a) := 1 - p - \Delta_{u^*}(h, s_i, a)$

where $\Delta_{u^*}(h, s_i, a) := \epsilon \mathbb{I}\{(h, s_i, a) = (h^*, s_{\ell^*}, a^*)\}$ for some constants $p \in [0, 1]$ and $\epsilon \in [0, \min(1 - p, p)]$ to be determined later. p and ϵ are the second and third parameters of the MDP class. Observe that s_g and s_b are absorbing, therefore we have $\forall a, P_h(s_g \mid s_g, a) := P_h(s_b \mid s_b, a) := 1$. The reward is a deterministic function of the state

$$r_h(s,a) := \mathbb{I}\{s = s_q, h \ge \hat{H}\}.$$

Finally, we define a reference MDP \mathcal{M}_0 which differs from the previous MDP instances only in that $\Delta_0(h, s_i, a) := 0$ for all (h, s_i, a) . For each ϵ, p and \overline{H} , we define the MDP class

$$\mathcal{C}_{ar{H},p,\epsilon} := \mathcal{M}_0 \cup \{\mathcal{M}_{u^*}\}_{u^* \in [d+1:ar{H}+d] imes \mathcal{L} imes \mathcal{A}^*}$$

For an MDP \mathcal{M}_{u^*} , the optimal policy $\pi^{*,\mathcal{M}_{u^*}}$ starts to traverse the tree at step $h^* - d$ then chooses to reach the leaf s_{l^*} and performs action a^* . The optimal value in any of these MDPs is the same

$$V_{1}^{*,\mathcal{M}_{u^{*}}} = V_{h^{*}}^{*,\mathcal{M}_{u^{*}}}(s_{l^{*}}) = Q_{h^{*}}^{*,\mathcal{M}_{u^{*}}}(s_{l^{*}},a^{*}) = r_{h}(s_{l^{*}},a^{*}) + \rho_{h^{*}}(V_{h^{*}+1}^{*,\mathcal{M}_{u^{*}}},P_{h}(s_{l^{*}},a^{*}))$$
$$= \rho_{h^{*}}((V_{h^{*}+1}^{*,\mathcal{M}_{u^{*}}}(s_{g}),V_{h^{*}+1}^{*,\mathcal{M}_{u^{*}}}(s_{b})),(p+\epsilon,1-p-\epsilon)).$$

For simplicity, we may drop \mathcal{M}_{u^*} from the notations. Notice that the agent must be in either of the absorbing states at step $h \geq \tilde{H} = \bar{H} + d + 1$. Observe that $V_H^{*,\mathcal{M}_{u^*}}(s_g) = r_H(s_g, a) = 1$ since $r_h(s_g, a) = 1$ for any a and any $h \geq \tilde{H}$, and $V_H^{*,\mathcal{M}_{u^*}}(s_b) = 0$. Thus we have:

$$Q_{H-1}^{*,\mathcal{M}_{u^{*}}}(s_{g},a) = r_{H-1}(s_{g},a) + \rho_{H-1}((V_{h^{*}+1}^{*,\mathcal{M}_{u^{*}}}(s_{g}), V_{h^{*}+1}^{*,\mathcal{M}_{u^{*}}}(s_{b})), (1,0)) = 1 + V_{h^{*}+1}^{*,\mathcal{M}_{u^{*}}}(s_{g}) = 2, \forall a, b \in \mathbb{C}$$

where the second equality follows from that $\rho_h(c) = c$ for a deterministic constant c. Therefore $V_{H-1}^{*,\mathcal{M}_{u^*}}(s_g) = 2$. Similarly we can get $V_{H-1}^{*,\mathcal{M}_{u^*}}(s_b) = 0$. It follows from inductions that $V_h^{*,\mathcal{M}_{u^*}}(s_g) = H + 1 - h$ and $V_h^{*,\mathcal{M}_{u^*}}(s_b) = 0$ for $h \geq \tilde{H}$. Moreover, observe that

$$V_{\tilde{H}-1}^{*,\mathcal{M}_{u^{*}}}(s_{g}) = 0 + \rho_{\tilde{H}-1}((V_{\tilde{H}}^{*,\mathcal{M}_{u^{*}}}(s_{g}), V_{\tilde{H}}^{*,\mathcal{M}_{u^{*}}}(s_{b})), (1,0)) = V_{\tilde{H}}^{*,\mathcal{M}_{u^{*}}}(s_{g}) = H + 1 - \tilde{H} = H'$$

and $V_{\tilde{H}-1}^{*,\mathcal{M}_{u^{*}}}(s_{b}) = 0$. Then $V_{h^{*}+1}^{*,\mathcal{M}_{u^{*}}}(s_{g}) = \cdots = V_{\tilde{H}-1}^{*,\mathcal{M}_{u^{*}}}(s_{g}) = H'$ and $V_{h^{*}+1}^{*,\mathcal{M}_{u^{*}}}(s_{b}) = \cdots = V_{\tilde{H}-1}^{*,\mathcal{M}_{u^{*}}}(s_{b}) = 0$. Thus the optimal value

$$V_{1}^{*,\mathcal{M}_{u^{*}}} = \rho_{h^{*}}((V_{h^{*}+1}^{*,\mathcal{M}_{u^{*}}}(s_{g}), V_{h^{*}+1}^{*,\mathcal{M}_{u^{*}}}(s_{b})), (p+\epsilon, 1-p-\epsilon))$$

= $\rho_{h^{*}}((V_{\tilde{H}}^{*,\mathcal{M}_{u^{*}}}(s_{g}), V_{\tilde{H}}^{*,\mathcal{M}_{u^{*}}}(s_{b})), (p+\epsilon, 1-p-\epsilon))$
= $\rho_{h^{*}}((H', 0), (p+\epsilon, 1-p-\epsilon))$

Consider the case that policy $\pi^k \neq \pi^*$. Then we have $(s_{h^*}^k, a_{h^*}^k) \neq (s_{l^*}, a^*)$. Analogously, we can get

$$V_h^{\pi^k}(s_g) = H + 1 - h, \ V_h^{*,\mathcal{M}_{u^*}}(s_b) = 0$$

for $h \ge \tilde{H}$. Suppose π^k arrives at the leaf node $s_{l^k}^k$ in step $l^k \in [1+d, \tilde{H}-1]$, then $V_{l^k+1}^{\pi^k}(s_g) = \cdots = V_{\tilde{H}}^{\pi^k}(s_g) = H + 1 - \tilde{H} = H'$ and $V_{l^k+1}^{\pi^k}(s_b) = \cdots = V_{\tilde{H}}^{\pi^k}(s_b) = 0$. Since $P_{l^k}(s_g|s_{l^k}^k, a_h^k) = p$,

$$V_1^{\pi^k} = \rho_{l^k}((V_{l^k+1}^{\pi^k}(s_g), V_{l^k+1}^{\pi^k}(s_b)), (p, 1-p)) = \rho_{l^k}((H', 0), (p, 1-p))$$

Denote by $x_h^k := (s_h^k, a_h^k)$ for each $(k, h), x^* := (s_{\ell^*}, a^*)$ and $N_K(u^*) := \sum_{k=1}^K \mathbb{I}\{x_{h^*}^k = x^*\}$. It follows that

$$V_1^{\pi^k} = \mathbb{I}\{x_{h^*}^k = x^*\}V_1^* + \mathbb{I}\{x_{h^*}^k \neq x^*\}\rho_{l^k}((H', 0), (p, 1-p))$$

Define c_{ρ} as the constant that satisfies

$$\rho((H,0),(p,1-p)) - \rho((H,0),(q,1-q)) \ge c_{\rho} \| ((H,0),(p,1-p)) - ((H,0),(q,1-q)) \|_{1} = c_{\rho} H |p-q|.$$

The expected regret of \mathscr{A} in \mathcal{M}_{u^*} can be bounded as

$$\begin{split} & \mathbb{E}_{\mathscr{A},\mathcal{M}_{u^{*}}}[\operatorname{Regret}(\mathscr{A},\mathcal{M}_{u^{*}},K)] \\ &= \mathbb{E}_{\mathscr{A},\mathcal{M}_{u^{*}}}\left[\sum_{k=1}^{K}V_{1}^{*}-V_{1}^{\pi^{k}}\right] \\ &= \mathbb{E}_{\mathscr{A},\mathcal{M}_{u^{*}}}\left[\sum_{k=1}^{K}\mathbb{I}\{x_{h^{*}}^{k} \neq x^{*}\}\left(\rho_{h^{*}}((H',0),(p+\epsilon,1-p-\epsilon))-\rho_{l^{k}}((H',0),(p,1-p))\right)\right] \\ &\geq \mathbb{E}_{\mathscr{A},\mathcal{M}_{u^{*}}}\left[\sum_{k=1}^{K}\mathbb{I}\{x_{h^{*}}^{k} \neq x^{*}\}c_{\rho} \| ((H',0),(p+\epsilon,1-p-\epsilon))-((H',0),(p,1-p)) \|_{1}\right] \\ &= \mathbb{E}_{\mathscr{A},\mathcal{M}_{u^{*}}}\left[\sum_{k=1}^{K}\mathbb{I}\{x_{h^{*}}^{k} \neq x^{*}\}c_{\rho}H'\epsilon\right] \\ &= c_{\rho}\epsilon H'(K-\mathbb{E}_{\mathscr{A},\mathcal{M}_{u^{*}}}[N_{K}(u^{*})]), \end{split}$$

Step 2. The maximum of the regret can be bounded below by the mean over all instances as

$$\max_{u^* \in [d+1:\bar{H}+d] \times \mathcal{L} \times \mathcal{A}} \operatorname{Regret}(\mathscr{A}, \mathcal{M}_{u^*}, K) \geq \frac{1}{\bar{H}\bar{L}A} \sum_{u^* \in [d+1:\bar{H}+d] \times \mathcal{L} \times \mathcal{A}} \operatorname{Regret}(\mathscr{A}, \mathcal{M}_{u^*}, K)$$
$$\geq c_{\rho,1} H' K \epsilon \left(1 - \frac{1}{\bar{L}AK\bar{H}} \sum_{u^* \in [d+1:\bar{H}+d] \times \mathcal{L} \times \mathcal{A}} \mathbb{E}_{u^*}[N_K(u^*)] \right).$$

Observe that it can be further bounded if we can obtain an upper bound on $\sum_{u^* \in [d+1:\bar{H}+d] \times \mathcal{L} \times \mathcal{A}} \mathbb{E}_{u^*}[N_K(u^*)]$, which can be done by relating each expectation to the expectation under the reference MDP \mathcal{M}_0 .

Fact 7 (Lemma 1,Garivier et al. (2019)). Consider a measurable space (Ω, \mathcal{F}) equipped with two distributions \mathbb{P}_1 and \mathbb{P}_2 . For any \mathcal{F} -measurable function $Z : \Omega \to [0, 1]$, we have

$$\operatorname{KL}(\mathbb{P}_1, \mathbb{P}_2) \ge \operatorname{kl}(\mathbb{E}_1[Z], \mathbb{E}_2[Z]),$$

where \mathbb{E}_1 and \mathbb{E}_2 are the expectations under \mathbb{P}_1 and \mathbb{P}_2 respectively.

Fact 8 (Lemma 5, Domingues et al. (2021)). Let \mathcal{M} and \mathcal{M}' be two MDPs that are identical except for their transition probabilities, denoted by P_h and P'_h , respectively. Assume that we have $\forall (s, a), P_h(\cdot | s, a) \ll P'_h(\cdot | s, a)$. Then, for any stopping time τ with respect to $(I_k)_{k>1}$ that satisfies $\mathbb{P}_{\mathcal{M}}[\tau < \infty] = 1$

$$\mathrm{KL}\left(\mathbb{P}_{\mathcal{M}},\mathbb{P}_{\mathcal{M}'}\right) = \sum_{(s,a,h)\in\mathcal{S}\times\mathcal{A}\times[H-1]} \mathbb{E}_{\mathcal{M}}\left[N_{h}^{\tau}(s,a)\right] \mathrm{KL}\left(P_{h}(\cdot\mid s,a),P_{h}'(\cdot\mid s,a)\right).$$

Fact 9 (Lemma 28, Liang and Luo (2022)). If $\epsilon \ge 0$, $p \ge 0$ and $p + \epsilon \in [0, \frac{1}{2}]$, then $\operatorname{kl}(p, p + \epsilon) \le \frac{\epsilon^2}{2p(1-p)} \le \frac{\epsilon^2}{p}$.

By applying Fact 7 with $Z = \frac{N_K(u^*)}{K} \in [0, 1]$, we have

$$\operatorname{kl}\left(\frac{1}{K}\mathbb{E}_{0}\left[N_{K}(u^{*})\right], \frac{1}{K}\mathbb{E}_{u^{*}}\left[N_{K}(u^{*})\right]\right) \leq \operatorname{KL}\left(\mathbb{P}_{0}, \mathbb{P}_{u^{*}}\right).$$

By Pinsker's inequality, it implies that

$$\frac{1}{K}\mathbb{E}_{u^*}[N_K(u^*)] \le \frac{1}{K}\mathbb{E}_0\left[N_K(u^*)\right] + \sqrt{\frac{1}{2}\operatorname{KL}\left(\mathbb{P}_0, \mathbb{P}_{u^*}\right)}$$

Since \mathcal{M}_0 and \mathcal{M}_{u^*} only differs at stage h^* when $(s, a) = x^*$, it follows from Fact 8 that

$$\operatorname{KL}(\mathbb{P}_0, \mathbb{P}_{u^*}) = \mathbb{E}_0\left[N_K(u^*)\right] \operatorname{kl}(p, p + \varepsilon).$$

By Fact 9, we have $kl(p, p + \epsilon) \leq \frac{\epsilon^2}{p}$ for $\epsilon \geq 0$ and $p + \epsilon \in [0, \frac{1}{2}]$. Consequently,

$$\frac{1}{K} \sum_{u^* \in [d+1:\bar{H}+d] \times \mathcal{L} \times \mathcal{A}} \mathbb{E}_{u^*} [N_K(u^*)]$$

$$\leq \frac{1}{K} \mathbb{E}_0 \left[\sum_{u^* \in [d+1:\bar{H}+d] \times \mathcal{L} \times \mathcal{A}} N_K(u^*) \right] + \frac{\epsilon}{\sqrt{2p}} \sum_{u^* \in [d+1:\bar{H}+d] \times \mathcal{L} \times \mathcal{A}} \sqrt{\mathbb{E}_0 \left[N_K(u^*) \right]}$$

$$\leq 1 + \frac{\epsilon}{\sqrt{2p}} \sqrt{\bar{L}AK\bar{H}},$$

where the second inequality is due to the Cauchy-Schwartz inequality and that $\sum_{u^* \in [d+1:\bar{H}+d] \times \mathcal{L} \times \mathcal{A}} N_K(u^*) = K$. It follows that

$$\max_{u^* \in [d+1:\bar{H}+d] \times \mathcal{L} \times \mathcal{A}} \operatorname{Regret}(\mathscr{A}, \mathcal{M}_{u^*}, K) \ge c_{\rho,1} H' K \epsilon \left(1 - \frac{1}{\bar{L}A\bar{H}} - \frac{\frac{\epsilon}{\sqrt{2p}}\sqrt{\bar{L}AK\bar{H}}}{\bar{L}A\bar{H}} \right)$$

Step 3. Choosing $\epsilon = \sqrt{\frac{p}{2}} (1 - \frac{1}{LA\overline{H}}) \sqrt{\frac{LA\overline{H}}{K}}$ maximizes the lower bound

$$\max_{u^* \in [d+1:\bar{H}+d] \times \mathcal{L} \times \mathcal{A}} \operatorname{Regret}(\mathscr{A}, \mathcal{M}_{u^*}, K) \ge \frac{\sqrt{p}}{2\sqrt{2}} c_{\rho,1} H' \left(1 - \frac{1}{\bar{L}A\bar{H}}\right)^2 \sqrt{\bar{L}AK\bar{H}}.$$

Since $S \ge 6$ and $A \ge 2$, we have $\bar{L} = (1 - \frac{1}{A})(S - 3) + \frac{1}{A} \ge \frac{S}{4}$ and $1 - \frac{1}{\bar{L}A\bar{H}} \ge 1 - \frac{1}{\frac{6}{4}\cdot 2} = \frac{2}{3}$. Choose $\bar{H} = \frac{H}{3}$ and use the assumption that $d \le \frac{H}{3}$ to obtain that $H' = H - d - \bar{H} \ge \frac{H}{3}$. Now we choose arbitrary $p \le \frac{1}{4}$ and $\epsilon = \sqrt{\frac{p}{2}}(1 - \frac{1}{\bar{L}A\bar{H}})\sqrt{\frac{LA\bar{H}}{K}} < \frac{1}{2\sqrt{2}}\sqrt{\frac{\bar{L}A\bar{H}}{K}} \le \frac{1}{4}$ if $K \ge 2\bar{L}A\bar{H}$. Such choice of p and ϵ guarantees the assumption of Fact 9. Finally we use the fact that $\sqrt{\bar{L}AK\bar{H}} \ge \frac{1}{2\sqrt{3}}\sqrt{SAKH}$ to obtain

$$\max_{u^* \in [d+1:\bar{H}+d] \times \mathcal{L} \times \mathcal{A}} \operatorname{Regret}(\mathscr{A}, \mathcal{M}_{u^*}, K) \geq \frac{\sqrt{p}}{27\sqrt{6}} c_{\rho} H \sqrt{SAKH}.$$

E.2 Gap-dependent Lower Bound

Theorem 6 (Gap-dependent regret lower bound). Let $S \ge 2$ and $A \ge 2$, and let $\{\delta_{s,a}\}_{s,a \in S \times A} \subset (0, \frac{H}{8})$ denote a set of gaps. For any $h \ge 1$, there exists an MDP \mathcal{M} with $\mathcal{S} = [S+2]$ and $\mathcal{A} = [A]$ such that any α -uniformly good algorithm alg satisfies

$$\lim_{K \to \infty} \frac{Regret(alg, \mathcal{M}, K)}{\log K} = \Omega\left((1 - \alpha) \sum_{(s,a):\Delta_1(s,a)>0} \frac{(c_{\rho}H)^2}{\Delta_1(s,a)} \right)$$

We first fix an arbitrary α -uniformly good algorithm \mathscr{A} . For simplicity, we may drop \mathscr{A} from the notations, e.g., $\mathbb{E}_{\mathcal{M}} = \mathbb{E}_{\mathcal{M},\mathscr{A}}$.

Step 1: construction of the hard instance. Our construction mirrors the lower bounds in . However, their instance is suited for homogeneous/stationary MDP. Define an MDP \mathcal{M} with $\mathcal{S} = \{0\} \cup [S+2]$ and $\mathcal{A} = [A]$. Without loss of generality, we consider the case $H \ge 2$. Otherwise, it reduces to a bandit setting. We first specify the transition kernels. For the convenience of analysis, we introduce $s_0 = 0$ at stage h = 0 with $P_0(s|0) = \frac{1}{S}$ for any $s \in [S]$. In other words, the initial state s_1 is uniformly distributed over [S]. For $(s, a) \in [S] \times [A]$, let

$$P_1(S+1|s,a) = \frac{3}{4} - \frac{2\delta_{s,a}}{H-1} =: \frac{3}{4} - \tilde{\delta}_{s,a}, \ P_1(S+1|s,a) = 1 - P_1(S+1|s,a) = \frac{1}{4} - \frac$$

Thus at stage 1, each state $s \in [S]$ can only transit to either state S + 1 or S + 2. Furthermore, we set state S + 1 and S + 2 to be absorbing state, i.e.

$$P_h(S+1|S+1,a) = P_h(S+2|S+2,a) = 1, \ \forall h \in [2:H-1], a \in [A].$$

Finally, we set the reward functions as

$$R(x,a) := \begin{cases} 1 & (x,a) = (S+1,1) \\ \frac{1}{2} & (x,a) = (S+2,1) \\ 0 & \text{otherwise.} \end{cases}$$

We assume that there exists a unique action $\pi^*(s)$ for each $s \in [S]$ such that $\delta_{s,\pi^*(s)} = 0$. We will see that such action is the optimal action. Note that S + 1 and S + 2 are absorbing states and the only two rewarding states, hence $V_h^*(S+1) = H + 1 - h$ and $V_h^*(S+2) = \frac{H+1-h}{2}$ for $h \in [2:H]$. It follows that for $x \in [S]$,

$$V_{h}^{*}(s) = 0 + \rho_{h}(V_{h+1}^{*}, P_{h}(s, \pi_{h}^{*}(s))) = \rho_{h}\left(\left(H - h, \frac{H - h}{2}\right), \left(\frac{3}{4}, \frac{1}{4}\right)\right),$$
$$Q_{h}^{*}(s, a) = 0 + \rho_{h}(V_{h+1}^{*}, P_{h}(s, a)) = \rho_{h}\left(\left(H - h, \frac{H - h}{2}\right), \left(\frac{3}{4} - \tilde{\delta}_{s, a}, \frac{1}{4} + \tilde{\delta}_{s, a}\right)\right)$$

which implies that

$$\begin{split} \Delta_h(s,a) &= \rho_h\left(\left(H-h,\frac{H-h}{2}\right), \left(\frac{3}{4},\frac{1}{4}\right)\right) - \rho_h\left(\left(H-h,\frac{H-h}{2}\right), \left(\frac{3}{4}-\tilde{\delta}_{s,a},\frac{1}{4}+\tilde{\delta}_{s,a}\right)\right) \\ &\geq c_\rho \left\|\left(\left(H-h,\frac{H-h}{2}\right), \left(\frac{3}{4},\frac{1}{4}\right)\right) - \left(\left(H-h,\frac{H-h}{2}\right), \left(\frac{3}{4}-\tilde{\delta}_{s,a},\frac{1}{4}+\tilde{\delta}_{s,a}\right)\right)\right\|_1 \\ &= c_\rho \frac{H-h}{2}\tilde{\delta}_{s,a}. \end{split}$$

In particular, we have $\Delta_1(s,a) \ge c_{\rho} \frac{H-1}{2} \tilde{\delta}_{s,a} = c_{\rho,1} \delta_{s,a}$. Note that $\Delta_1(s,a)$ is only defined for $s \in [S]$.

Step 2: regret decomposition. The regret for algorithm \mathscr{A} over MDP \mathcal{M} can be decomposed as follows

$$\operatorname{Regret}(\mathscr{A}, \mathcal{M}, K) = \mathbb{E}\left[\sum_{k=1}^{K} V_{1}^{*}(s_{1}^{k}) - V_{1}^{\pi^{k}}(s_{1}^{k})\right]$$
$$= \mathbb{E}\left[\sum_{k=1}^{K} \sum_{h=1}^{H} \Delta_{h}(s_{h}^{k}, a_{h}^{k})\right]$$
$$= \mathbb{E}\left[\sum_{k=1}^{K} \sum_{h=1}^{H} \sum_{s,a} \mathbb{I}\left\{s_{h}^{k} = s, a_{h}^{k} = a\right\} \Delta_{h}(s_{h}^{k}, a_{h}^{k})\right]$$
$$= \sum_{h=1}^{H} \sum_{s,a} \mathbb{E}\left[\sum_{k=1}^{K} \mathbb{I}\left\{s_{h}^{k} = s, a_{h}^{k} = a\right\}\right] \Delta_{h}(s, a)$$
$$= \sum_{h=1}^{H} \sum_{s,a} \mathbb{E}\left[N_{h}^{K}(s, a)\right] \Delta_{h}(s, a)$$
$$= \sum_{h=1}^{H} \sum_{s\in[S],a} \mathbb{E}\left[N_{h}^{K}(s, a)\right] \Delta_{h}(s, a).$$

where the last equality is due to that $\Delta_h(s, a)$ is only defined over [S]. For our hard instance, observe that $\mathbb{I}\left\{s_h^k = s\right\} = 0$ for $s \in [S]$ and $h \neq 1$. Therefore $N_h^K(s, a) = 0$ for $s \in [S]$ and $h \neq 1$, which implies

Regret
$$(\mathscr{A}, \mathcal{M}, K) = \sum_{s \in [S], a} \mathbb{E} \left[N_1^K(s, a) \right] \Delta_1(s, a).$$

We claim that for any (s, a) such that $s \in [S]$ and $\Delta_1(s, a) > 0$, and any $K \ge K_0(\mathcal{M})$, it holds that

$$\mathbb{E}_{\mathscr{A},\mathcal{M}}\left(N_1^K(s,a)\right) \ge \Omega\left(\frac{1}{\tilde{\delta}_{s,a}^2}\log K\right) = \Omega\left(\frac{(c_{\rho,1}H)^2}{\Delta_1(s,a)^2}\log K\right).$$

It follows that

$$\operatorname{Regret}(\mathscr{A}, \mathcal{M}, K) \ge \Omega\left(\sum_{s \in [S], a: \Delta_1(s, a) > 0} \frac{(c_{\rho, 1}H)^2}{\Delta_1(s, a)} \log K\right).$$

Step 3: bounding $\mathbb{E}\left[N_h^K(s,a)\right]$. Observe that $\tilde{\delta}_{s,a} = \frac{2}{H-1}\delta_{s,a} \in (0, \frac{1}{2})$ due to the assumption that $\delta_{s,a} \in (0, \frac{H}{8})$. By Fact 7 and Fact 8, let Z be a \mathcal{F}^K -measurable random variable, then it holds that

$$\mathrm{kl}\left(\mathbb{E}_{\mathcal{M}}[Z],\mathbb{E}_{\mathcal{M}'}[Z]\right) \leq \sum_{(s,a,h)\in\mathcal{S}\times\mathcal{A}\times[H-1]} \mathbb{E}_{\mathcal{M}}\left[N_h^K(s,a)\right] \mathrm{KL}\left(P_h(s,a),P_h'(s,a)\right)$$

Now fix an arbitrary $(s, a) \in [S] \times [A]$. Define an MDP $\mathcal{M}'_{s,a}$ which differs from M only in that $P_1(S+1|s,a) = \frac{3}{4} + \eta$, where $\eta = \min\{\frac{1}{8}, \tilde{\delta}_{s,a}\}$. For simplicity, we write $\mathcal{M}' = \mathcal{M}'_{s,a}$. The following holds

$$\operatorname{kl}\left(\mathbb{E}_{\mathcal{M}}[Z],\mathbb{E}_{\mathcal{M}'}[Z]\right) \leq \mathbb{E}_{\mathcal{M}}\left[N_{1}^{K}(s,a)\right]\operatorname{KL}\left(P_{1}(s,a),P_{1}'(s,a)\right) = \mathbb{E}_{\mathcal{M}}\left[N_{1}^{K}(s,a)\right]\operatorname{kl}\left(\frac{3}{4} - \tilde{\delta}_{s,a},\frac{3}{4} + \eta\right).$$

Observe that $\frac{1}{4} < \frac{3}{4} - \tilde{\delta}_{s,a} < \frac{3}{4} + \eta < \frac{7}{8}$ and $\eta + \tilde{\delta}_{s,a} \leq 2\tilde{\delta}_{s,a}$, it follows from Fact 9 that

$$\operatorname{kl}\left(\frac{3}{4} - \tilde{\delta}_{s,a}, \frac{3}{4} + \eta\right) \le \frac{(\eta + \tilde{\delta}_{s,a})^2}{2(\frac{3}{4} - \tilde{\delta}_{s,a})(1 - \frac{3}{4} - \eta)} < 64\tilde{\delta}_{s,a}^2$$

Now we have

$$\mathbb{E}_{\mathcal{M}}\left[N_1^K(s,a)\right] \ge \frac{1}{64\tilde{\delta}_{s,a}^2} \mathrm{kl}\left(\mathbb{E}_{\mathcal{M}}[Z], \mathbb{E}_{\mathcal{M}'}[Z]\right) \ge \frac{(c_{\rho,1}(H-1))^2}{256\Delta_1^2(s,a)} \mathrm{kl}\left(\mathbb{E}_{\mathcal{M}}[Z], \mathbb{E}_{\mathcal{M}'}[Z]\right).$$

We set $Z = \sum_{k=1}^{K} \frac{\mathbb{I}\{\pi_1^k(s)=a\}}{K} \in [0,1]$. Note that Z is indeed \mathcal{F}^K -measurable random variable since π^k is \mathcal{F}^K -measurable and (s,a) is fixed. Denote by Δ' the gap for MDP \mathcal{M}' . Observe that for $a' \neq a$,

$$\begin{aligned} \Delta_1'(s,a') &= \rho_h\left(\left(H-1,\frac{H-1}{2}\right), \left(\frac{3}{4}+\eta,\frac{1}{4}-\eta\right)\right) - \rho_h\left(\left(H-1,\frac{H-1}{2}\right), \left(\frac{3}{4}-\tilde{\delta}_{s,a'},\frac{1}{4}+\tilde{\delta}_{s,a'}\right)\right) \\ &\geq c_\rho \frac{H-1}{2}(\eta+\tilde{\delta}_{s,a'}) \geq c_\rho \frac{H-1}{2}\eta. \end{aligned}$$

Under MDP \mathcal{M}' , action a is the unique optimal action for s, thus

$$\begin{aligned} \operatorname{Regret}(\mathscr{A}, \mathcal{M}', K) &\geq \sum_{a' \neq a} \mathbb{E}_{\mathcal{M}'} \left[N_1^K(s, a') \right] \Delta_1'(s, a') \\ &\geq c_{\rho} \frac{H-1}{2} \eta \sum_{a' \neq a} \mathbb{E}_{\mathcal{M}'} \left[N_1^K(s, a') \right] \\ &= c_{\rho} \frac{H-1}{2} \eta \mathbb{E}_{\mathcal{M}'} \left[\sum_{k=1}^K \sum_{a' \neq a} \mathbb{I} \left(s_1^k = s, \pi_1^k(s_1^k) = a \right) \right] \\ &= c_{\rho} \frac{H-1}{2} \eta \mathbb{E}_{\mathcal{M}'} \left[\sum_{k=1}^K \left(\mathbb{I} \left(s_1^k = s \right) - \mathbb{I} \left(s_1^k = s, \pi_1^k(s_1^k) = a \right) \right) \right] \\ &= c_{\rho} \frac{H-1}{2} \eta \left(\frac{K}{S} - \mathbb{E}_{\mathcal{M}'} \left[\sum_{k=1}^K \mathbb{I} \left(s_1^k = s \right) \mathbb{I} \left(\pi_1^k(s) = a \right) \right] \right) \\ &= c_{\rho} \frac{H-1}{2} \eta \left(\frac{K}{S} - \sum_{k=1}^K \mathbb{E}_{\mathcal{M}'} \left[\mathbb{I} \left(s_1^k = s \right) \right] \mathbb{E}_{\mathcal{M}'} \left[\mathbb{I} \left(\pi_1^k(s) = a \right) \right] \right) \\ &= c_{\rho} \frac{H-1}{2} \frac{K}{S} \left(1 - \mathbb{E}_{\mathcal{M}'} \left[Z \right] \right), \end{aligned}$$

where the second to the last equality is due to the dependence between s_1^k and π_1^k . Since \mathscr{A} is α -uniformly good algorithm, there exists $C_{\mathcal{M}'} > 0$ such that

$$c_{\rho}\frac{H-1}{2}\frac{K}{S}\left(1-\mathbb{E}_{\mathcal{M}'}\left[Z\right]\right) \leq \operatorname{Regret}(\mathscr{A},\mathcal{M}',K) \leq C_{\mathcal{M}'}K^{\alpha},$$

implying

$$1 - \mathbb{E}_{\mathcal{M}'}[Z] \le \frac{2C_{\mathcal{M}'}S}{c_{\rho,1}(H-1)K^{1-\alpha}}$$

We can also get

$$C_{\mathcal{M}}K^{\alpha} \ge \operatorname{Regret}(\mathscr{A}, \mathcal{M}, K) \ge \mathbb{E}_{\mathcal{M}}\left[N_{1}^{K}(s, a)\right] \Delta_{1}(s, a) \ge \frac{K\Delta_{1}(s, a)}{S} \mathbb{E}_{\mathcal{M}}\left[Z\right]$$

which implies that $\mathbb{E}_{\mathcal{M}}[Z] \leq \frac{C_{\mathcal{M}}S}{\Delta_1(s,a)K^{1-\alpha}}$. Observe that

$$kl(x, y) \ge (1 - x) \log \frac{1}{1 - y} - \log 2$$

It follows that

$$\operatorname{kl}\left(\mathbb{E}_{\mathcal{M}}\left[Z\right],\mathbb{E}_{\mathcal{M}'}\left[Z\right]\right) \geq \left(1 - \frac{C_{\mathcal{M}}S}{\Delta_{1}(s,a)K^{1-\alpha}}\right)\left((1-\alpha)\log K - \log\frac{2C_{\mathcal{M}'}S}{c_{\rho,1}(H-1)}\right) - \log 2$$

Step 4. We can also prove for the case $h \neq 1$ by modifying the transition kernels for state 0. For $h \neq 1$, we set the transition kernels as

$$P_l(0|0,a) = 1, \forall l \in [0:h-2], \forall a \in [A], \ P_{h-1}(s|0,a) = \frac{1}{S}, \forall s \in [S], \forall a \in [A].$$

In other words, the MDP is randomly initialized over [S] at stage h rather than stage 1. For $(s, a) \in [S] \times [A]$, let

$$P_h(S+1|s,a) = \frac{3}{4} - \frac{2\delta_{s,a}}{H-1} =: \frac{3}{4} - \tilde{\delta}_{s,a}, \ P_h(S+1|s,a) = 1 - P_h(S+1|s,a).$$

Finally, we still set S + 1, S + 2 to be absorbing states. Using similar arguments concludes the proof.