

<sup>1</sup> PyCFRL: A Python library for counterfactually fair  
<sup>2</sup> offline reinforcement learning via sequential data  
<sup>3</sup> preprocessing

<sup>4</sup> Jianhan Zhang<sup>1</sup>, Jitao Wang<sup>2</sup>, Chengchun Shi<sup>3</sup>, John D. Piete<sup>4</sup>, Donglin  
<sup>5</sup> Zeng<sup>2</sup>, and Zhenke Wu<sup>2†</sup>

<sup>6</sup> 1 Department of Statistics, University of Michigan, USA 2 Department of Biostatistics, University of  
<sup>7</sup> Michigan, USA 3 Department of Statistics, London School of Economics, UK 4 Department of Health  
<sup>8</sup> Behavior and Health Equity, School of Public Health, University of Michigan, USA ¶ Corresponding  
<sup>9</sup> author

DOI: [10.xxxxxx/draft](https://doi.org/10.xxxxxx/draft)

Software

- [Review ↗](#)
- [Repository ↗](#)
- [Archive ↗](#)

---

Editor: [Open Journals](#) ↗

Reviewers:

- [@openjournals](#)

Submitted: 01 January 1970

Published: unpublished

License

Authors of papers retain copyright  
and release the work under a  
Creative Commons Attribution 4.0  
International License ([CC BY 4.0](#)).<sup>34</sup>

<sup>10</sup> **Summary**

<sup>11</sup> Reinforcement learning (RL) aims to learn and evaluate a sequential decision rule, often referred  
<sup>12</sup> to as a “policy”, that maximizes expected discounted cumulative rewards to optimize the  
<sup>13</sup> population-level benefit in an environment across possibly infinitely many time steps. RL  
<sup>14</sup> has gained popularity in fields such as healthcare, banking, autonomous driving, and, more  
<sup>15</sup> recently, large language model fine-tuning. However, the sequential decisions made by an RL  
<sup>16</sup> algorithm, while optimized to maximize overall population benefits, may disadvantage certain  
<sup>17</sup> individuals who are in minority or socioeconomically disadvantaged groups. A fairness-unaware  
<sup>18</sup> RL algorithm learns an optimal policy that makes decisions based on the *observed* state  
<sup>19</sup> variables. However, if certain values of the sensitive attribute influence the state variables  
<sup>20</sup> and lead the policy to systematically withhold certain actions from an individual, unfairness  
<sup>21</sup> will result. For example, Hispanics may under-report their pain levels due to cultural factors,  
<sup>22</sup> misleading a fairness-unaware RL agent to assign less therapist time to these individuals ([Piete  
et al., 2023](#)). Deployment of RL algorithms without careful fairness considerations can raise  
<sup>23</sup> concerns and erode public trust in high-stakes settings.

<sup>24</sup> To formally define and address the fairness problem in the novel sequential decision-making  
<sup>25</sup> settings, Wang et al. (2025) extended the concept of single-stage counterfactual fairness (CF)  
<sup>26</sup> in a structural causal framework ([Kusner et al., 2018](#)) to the multi-stage setting and proposed  
<sup>27</sup> a data preprocessing algorithm that ensures CF. A policy is counterfactually fair if, at every  
<sup>28</sup> time step, the probability of assigning any action does not change had the individual’s sensitive  
<sup>29</sup> attribute taken a different value, while holding constant other historical exogenous variables  
<sup>30</sup> and actions. In this light, the data preprocessing algorithm ensures CF by constructing new  
<sup>31</sup> state variables that are not impacted by the sensitive attribute(s). Reward preprocessing is  
<sup>32</sup> also conducted, but with a different purpose to improve the value of the learned optimal policy  
<sup>33</sup> rather than to ensure CF. We refer interested readers to Wang et al. (2025) for more technical  
<sup>34</sup> details.

<sup>35</sup> The PyCFRL library implements the data preprocessing algorithm proposed by Wang et al.  
<sup>36</sup> (2025) and provides functionalities to evaluate the value (expected discounted cumulative  
<sup>37</sup> reward) and counterfactual unfairness level achieved by any given policy. Here, “CFRL” stands  
<sup>38</sup> for “Counterfactual Fairness in Reinforcement Learning”. The library produces preprocessed  
<sup>39</sup> trajectories that can be used by an off-the-shelf offline RL algorithm, such as fitted Q-iteration  
<sup>40</sup> (FQI) ([Riedmiller, 2005](#)), to learn an optimal CF policy. The library can also simply read in  
<sup>41</sup> any policy following a required format and return its value and counterfactual unfairness level  
<sup>42</sup> in the environment of interest, where the environment can be either pre-specified or learned  
<sup>43</sup>

<sup>44</sup> from the data.

## <sup>45</sup> Statement of Need

<sup>46</sup> Many existing Python libraries implement algorithms designed to ensure fairness in machine  
<sup>47</sup> learning. For example, Fairlearn ([Weerts et al., 2023](#)) and aif360 ([Bellamy et al., 2018](#))  
<sup>48</sup> provide tools for mitigating bias in single-stage machine learning predictions under statistical  
<sup>49</sup> association-based fairness criteria such as demographic parity and equal opportunity. However,  
<sup>50</sup> existing libraries do not focus on counterfactual fairness, which defines an individual-level  
<sup>51</sup> fairness concept from a causal perspective, and they cannot be easily extended to the general  
<sup>52</sup> RL setting. Scripts available from ml-fairness-gym ([D'Amour et al., 2020](#)) allow users to  
<sup>53</sup> simulate unfairness in sequential decision-making, but they neither implement algorithms that  
<sup>54</sup> reduce unfairness nor address CF. To our knowledge, Wang et al. ([2025](#)) is the first work to  
<sup>55</sup> study CF in RL. Correspondingly, PyCFRL is also the first code library to address CF in the RL  
<sup>56</sup> setting.

<sup>57</sup> The contribution of PyCFRL is two-fold. First, PyCFRL implements a data preprocessing algorithm  
<sup>58</sup> that ensures CF in offline RL. For each individual in the data, the preprocessing algorithm  
<sup>59</sup> sequentially estimates and concatenates the counterfactual states under different sensitive  
<sup>60</sup> attribute values with the observed state at each time point into a new state vector. The  
<sup>61</sup> preprocessed data can then be directly used by existing RL algorithms for policy learning, and  
<sup>62</sup> the learned policy will be counterfactually fair up to finite-sample estimation accuracy. Second,  
<sup>63</sup> PyCFRL provides a platform for assessing RL policies based on CF. After passing in any policy  
<sup>64</sup> and a data trajectory from the environment of interest, users can estimate the value and  
<sup>65</sup> counterfactual unfairness level achieved by the policy in the environment of interest.

## <sup>66</sup> High-level Design

<sup>67</sup> The PyCFRL library is composed of 5 major modules as summarized below.

Module	Functionalities
reader	Implements functions that read tabular trajectory data into an array format required by PyCFRL. Also implements functions that export trajectory data to the tabular format.
preprocessor	Implements the data preprocessing algorithm introduced in Wang et al. ( <a href="#">2025</a> ).
agents	Implements an FQI algorithm ( <a href="#">Riedmiller, 2005</a> ), which learns RL policies and makes decisions based on the learned policy.
environment	Implements a synthetic environment that produces synthetic data as well as a simulated environment that estimates and simulates the transition dynamics of the unknown environment underlying some real-world RL trajectory data. Also implements functions for sampling trajectories from the synthetic and simulated environments.
evaluation	Implements functions that evaluate the value and counterfactual unfairness level of a policy.

<sup>68</sup> A general PyCFRL workflow is as follows: First, simulate trajectories using environment or read  
<sup>69</sup> in trajectories using reader. Then, train a preprocessor using preprocessor and preprocess the  
<sup>70</sup> training trajectory data. After that, pass the preprocessed trajectories into the FQI algorithm in  
<sup>71</sup> agents to learn a counterfactually fair policy. Finally, use functions in evaluation to evaluate  
<sup>72</sup> the value and counterfactual unfairness level of the trained policy.

73 In addition, PyCFRL also provides tools to check for potential non-convergence that may arise  
74 during the training of neural networks, FQI, or fitted-Q evaluation (FQE). More discussions  
75 about non-convergence in PyCFRL can be found in the “[Common Issues](#)” section of the  
76 documentation.

## 77 Data Examples

78 In the “[Example Workflows](#)” section of the documentation, we provide data examples with  
79 code to demonstrate some major workflows of PyCFRL. We also record the computing times  
80 of different workflows under different combinations of the number of individuals ( $N$ ) and the  
81 length of horizons ( $T$ ) in the “[Computing Times](#)” section of the documentation.

## 82 Conclusions

83 PyCFRL is a Python library that enables counterfactually fair reinforcement learning through  
84 data preprocessing. It also provides tools to calculate the value and unfairness level of a given  
85 policy. To our knowledge, it is the first library to address CF problems in the context of RL. The  
86 practical utility of PyCFRL can be further improved via extensions. First, the current PyCFRL  
87 implementation requires every individual in the offline dataset to have the same number of  
88 time steps. Extending the library to accommodate variable-length episodes can improve its  
89 flexibility and usefulness. Second, PyCFRL can further combine the preprocessor with popular  
90 offline RL algorithm libraries such as d3rlpy ([Seno & Imai, 2022](#)), or connect the evaluation  
91 functions with established RL environment libraries such as gym ([Towers et al., 2024](#)). Third,  
92 generalization to non-additive counterfactual states reconstruction can make PyCFRL more  
93 versatile. We leave these extensions to future updates.

## 94 Acknowledgements

95 Jianhan Zhang and Jitao Wang contributed equally to this work. The authors declare no  
96 conflicts of interest.

## 97 References

- 98 Bellamy, R. K. E., Dey, K., Hind, M., Hoffman, S. C., Houde, S., Kannan, K., Lohia, P.,  
99 Martino, J., Mehta, S., Mojsilovic, A., Nagar, S., Ramamurthy, K. N., Richards, J., Saha,  
100 D., Sattigeri, P., Singh, M., Varshney, K. R., & Zhang, Y. (2018). *AI Fairness 360: An  
extensible toolkit for detecting, understanding, and mitigating unwanted algorithmic bias*.
- 102 D’Amour, A., Srinivasan, H., Atwood, J., Baljekar, P., Sculley, D., & Halpern, Y. (2020).  
103 Fairness is not static: Deeper understanding of long term fairness via simulation studies.  
104 *Proceedings of the 2020 Conference on Fairness, Accountability, and Transparency*, 525–534.  
105 <https://doi.org/10.1145/3351095.3372878>
- 106 Kusner, M. J., Loftus, J. R., Russell, C., & Silva, R. (2018). *Counterfactual Fairness*.  
107 <https://arxiv.org/abs/1703.06856>
- 108 Piette, J. D., Thomas, L., Newman, S., Marinac, N., Krauss, J., Chen, J., Wu, Z., & Bohnert,  
109 A. S. B. (2023). An automatically adaptive digital health intervention to decrease opioid-  
110 related risk while conserving counselor time: Quantitative analysis of treatment decisions  
111 based on artificial intelligence and patient-reported risk measures. *Journal of Medical  
Internet Research*, 25, e44165. <https://doi.org/10.2196/44165>
- 113 Riedmiller, M. (2005). Neural fitted Q iteration – first experiences with a data efficient neural  
114 reinforcement learning method. In J. Gama, R. Camacho, P. B. Brazdil, A. M. Jorge, & L.

- 115 Torgo (Eds.), *Machine learning: ECML 2005* (pp. 317–328). Springer Berlin Heidelberg.  
116 ISBN: 978-3-540-31692-3
- 117 Seno, T., & Imai, M. (2022). d3rlpy: An offline deep reinforcement learning library. *Journal of*  
118 *Machine Learning Research*, 23(315), 1–20.
- 119 Towers, M., Kwiatkowski, A., Terry, J., Balis, J. U., De Cola, G., Deleu, T., Goulão, M.,  
120 Kallinteris, A., Krimmel, M., KG, A., & others. (2024). Gymnasium: A standard interface  
121 for reinforcement learning environments. *arXiv Preprint arXiv:2407.17032*.
- 122 Wang, J., Shi, C., Piette, J. D., Loftus, J. R., Zeng, D., & Wu, Z. (2025). *Counterfactually fair*  
123 *reinforcement learning via sequential data preprocessing*. <https://arxiv.org/abs/2501.06366>
- 124 Weerts, H., Dudík, M., Edgar, R., Jalali, A., Lutz, R., & Madaio, M. (2023). Fairlearn:  
125 Assessing and improving fairness of AI systems. In *Journal of Machine Learning Research*  
126 (No. 257; Vol. 24, pp. 1–8).