
COUNTERFACTUAL TRAINING: TEACHING MODELS PLAUSIBLE AND ACTIONABLE EXPLANATIONS

A PREPRINT

Patrick Altmeyer 

Faculty of Electrical Engineering, Mathematics and Computer Science
Delft University of Technology

p.altmeyer@tudelft.nl

Aleksander Buszydlik

Faculty of Electrical Engineering, Mathematics and Computer Science
Delft University of Technology

Arie van Deursen

Faculty of Electrical Engineering, Mathematics and Computer Science
Delft University of Technology

Cynthia C. S. Liem

Faculty of Electrical Engineering, Mathematics and Computer Science
Delft University of Technology

March 13, 2025

ABSTRACT

We propose a novel training regime termed Counterfactual Training that leverages counterfactual explanations to increase the explanatory capacity of models. Counterfactual explanations have emerged as a popular post-hoc explanation method for opaque machine learning models: they inform how factual inputs would need to change in order for a model to produce some desired output. To be useful in real-word decision-making systems, counterfactuals should be plausible with respect to the underlying data and actionable with respect to the stakeholder requirements. Much existing research has therefore focused on developing post-hoc methods to generate counterfactuals that meet these desiderata. In this work, we instead hold models directly accountable for the desired end goal: Counterfactual Training employs counterfactuals ad-hoc during the training phase to minimize the divergence between learned representations and plausible, actionable explanations. We demonstrate empirically and theoretically that our proposed method facilitates training models that deliver inherently desirable explanations while maintaining high predictive performance.

Keywords Counterfactual Training • Counterfactual Explanations • Algorithmic Recourse • Explainable AI • Representation Learning

1 Introduction

Today's prominence of artificial intelligence (AI) has largely been driven by **representation learning**: instead of relying on features and rules that are carefully hand-crafted by humans, modern machine learning (ML) models are tasked

18 with learning representations directly from data, guided by narrow objectives such as predictive accuracy (I. Good-
 19 fellow, Bengio, and Courville 2016). Modern advances in computing have made it possible to provide such models
 20 with ever-growing degrees of freedom to achieve that task, which frequently allows them to outperform tradition-
 21 ally more parsimonious models. Unfortunately, in doing so, models learn increasingly complex and highly sensitive
 22 representations that humans can no longer easily interpret.

23 The trend towards complexity for the sake of performance has come under serious scrutiny in recent years. At the very
 24 cusp of the deep learning revolution, Szegedy et al. (2013) showed that artificial neural networks (ANN) are sensitive
 25 to adversarial examples: perturbed versions of data instances that yield vastly different model predictions despite being
 26 “imperceptible” in that they are semantically indifferent from their factual counterparts. Even though some partially
 27 effective mitigation strategies have been proposed—most notably **adversarial training** (I. J. Goodfellow, Shlens, and
 28 Szegedy 2014)—truly robust deep learning (DL) remains unattainable even for models that are considered shallow by
 29 today’s standards (Kolter 2023).

30 Part of the problem is that the high degrees of freedom provide room for many solutions that are locally optimal with
 31 respect to narrow objectives (Wilson 2020).¹ Indeed, recent work on the so called “lottery ticket hypothesis” suggests
 32 that modern neural networks can be pruned by up to 90% while preserving their predictive performance (Frankle and
 33 Carbin 2019) and generalizability (Morcos et al. 2019). Similarly, Zhang et al. (2021) showed that state-of-the-art
 34 neural networks are so expressive that they can fit randomly labeled data. Thus, looking at the predictive performance
 35 alone, the solutions may seem to provide compelling explanations for the data, when in fact they are based on purely
 36 associative, semantically meaningless patterns. This poses two related challenges. Firstly, there is no dependable way
 37 to verify if such complex representations correspond to meaningful and plausible explanations. Secondly, even if we
 38 could resolve the first challenge, it remains undecided how to ensure that models can *only* learn valuable explanations.

39 The first challenge has attracted an abundance of research on **explainable AI** (XAI), a paradigm that focuses on the
 40 development of tools to derive (post-hoc) explanations from complex model representations. Such explanations should
 41 mitigate a scenario in which practitioners deploy opaque models and blindly rely on their predictions. On countless
 42 occasions, this has happened in practice and caused real harms to people who were adversely and unfairly affected
 43 by automated decision-making (ADM) systems involving opaque models (O’Neil 2016; McGregor 2021). Effective
 44 XAI tools can aid us in monitoring models and providing recourse to individuals to turn negative outcomes (e.g.,
 45 “loan application rejected”) into positive ones (e.g., “application accepted”). Our work builds upon **counterfactual**
 46 **explanations** (CE) proposed by Wachter, Mittelstadt, and Russell (2017) as an effective approach to achieve this goal.
 47 CEs prescribe minimal changes for factual inputs that, if implemented, would prompt some fitted model to produce a
 48 desired output.

49 To our surprise, the second challenge has not yet attracted major research interest. Specifically, there has been no
 50 concerted effort towards improving the “explanatory capacity” of models, i.e., the degree to which learned representa-
 51 tions correspond to explanations that are **interpretable** and deemed **plausible** by humans (see Definition 3.1). Instead,
 52 the choice has generally been to improve the ability of XAI tools to identify the subset of explanations that are both
 53 plausible and valid for any given model, independent of whether the learned representations are also compatible with
 54 plausible explanations (Altmeyer et al. 2024). Fortunately, recent findings indicate that improved explanatory capacity
 55 can arise as a consequence of regularization techniques aimed at other training objectives such as robustness, gener-
 56 alization, and generative capacity (Schut et al. 2021; Augustin, Meinke, and Hein 2020; Altmeyer et al. 2024). As
 57 further discussed in Section 2, our work consolidates these findings within a single objective.

58 **Specifically, we introduce counterfactual training:** a novel training regime explicitly meant to align learned repre-
 59 sentations with plausible explanations that comply with user requirements. Our contributions are as follows:

- 60 • We present a novel methodological framework that leverages adversarial examples and faithful counterfac-
 61 tual explanations during the training phase to improve the explanatory capacity and robustness of machine
 62 learning models (Section 3).
- 63 • We propose a method to enforce global actionability constraints by preventing models from assigning
 64 importance to immutable features, i.e., ones over which decision subjects have no control (Section 3).
- 65 • Through extensive experiments we demonstrate that counterfactual training promotes explainability while
 66 preserving high predictive performance. We run ablation studies and grid searches to understand how the
 67 underlying model components and hyperparameters affect outcomes. (Section 4).

¹We follow the standard ML convention, where “degrees of freedom” refer to the number of parameters estimated from data.

70 Despite some limitations discussed in Section 5, we conclude in Section 6 that counterfactual training provides a useful
 71 framework for researchers and practitioners interested in making opaque models more trustworthy. We also believe
 72 that this work serves as an opportunity for XAI researchers to re-evaluate the trend of improving XAI tools without
 73 improving the underlying models.

74 2 Related Literature

75 To the best of our knowledge, the proposed framework for counterfactual training represents the first attempt to use
 76 counterfactual explanations during training to improve model explainability. In high-level terms, we define model
 77 explainability as the extent to which valid explanations derived for an opaque model are also deemed plausible with
 78 respect to the underlying data and stakeholder requirements; the former means that the counterfactuals should comply
 79 with the distribution of the factual data, the latter means that they should respect arbitrary (global) actionability
 80 constraints. To make the desiderata for our framework more concrete, we follow Augustin, Meinke, and Hein (2020)
 81 in tying the concept of explainability to the quality of counterfactual explanations that we can generate for a given
 82 model. The authors show that CEs—understood here as minimal input perturbations that yield some desired model
 83 prediction—are generally more meaningful if the underlying model is more robust to adversarial examples. We can
 84 make intuitive sense of this finding when looking at adversarial training (AT) through the lens of representation learning
 85 with high degrees of freedom. As argued before, learned representations may be sensitive to producing implausible
 86 explanations and mispredicting for worst-case counterfactuals (i.e., adversarial examples). Thus, by inducing models
 87 to “unlearn” susceptibility to such examples, AT can effectively remove implausible explanations from the solution
 88 space.

89 2.1 Adversarial Examples are Counterfactual Explanations

90 This interpretation of the link between explainability through counterfactuals on one side and robustness to adversarial
 91 examples on the other is backed by empirical evidence. Sauer and Geiger (2021) demonstrate that using counter-
 92 factual images during classifier training improves model robustness. Similarly, Abbasnejad et al. (2020) argue that
 93 counterfactuals represent potentially useful training data in machine learning, especially in supervised settings where
 94 inputs may be reasonably mapped to multiple outputs. They, too, demonstrate that augmenting the training data of
 95 image classifiers can improve generalization. Finally, Teney, Abbasnejad, and Hengel (2020) propose an approach
 96 using counterfactuals in training that does not rely on data augmentation: they argue that counterfactual pairs typically
 97 already exist in training datasets. Specifically, their approach relies on identifying similar input samples with different
 98 annotations and ensuring that the gradient of the classifier aligns with the vector between such pairs of counterfactual
 99 inputs using the cosine distance as the loss function.

100 In the natural language processing (NLP) domain, counterfactuals have similarly been used to improve models through
 101 data augmentation. Wu et al. (2021) propose *Polyjuice*, a general-purpose counterfactual generator for language mod-
 102 els. They demonstrate empirically that the augmentation of training data through *Polyjuice* counterfactuals improves
 103 robustness in a number of NLP tasks. Balashankar et al. (2023) similarly use *Polyjuice* to augment NLP datasets
 104 through diverse counterfactuals and show that classifier robustness improves by up to 20%. Finally, Luu and Inoue
 105 (2023) introduce Counterfactual Adversarial Training (CAT), which also aims at improving generalization and robust-
 106 ness of language models through a three-step procedure. First, the authors identify training samples that are subject
 107 to high predictive uncertainty. Second, they generate counterfactual explanations for those samples. Finally, they
 108 fine-tune the given language model on the augmented dataset that includes the generated counterfactuals.

109 There have also been several attempts at formalizing the relationship between counterfactual explanations and adver-
 110 sarial examples (AE). Pointing to clear similarities in how CEs and AEs are generated, Freiesleben (2022) makes
 111 the case for jointly studying the opaqueness and robustness problems in representation learning. Formally, AEs can
 112 be seen as the subset of CEs for which misclassification is achieved (Freiesleben 2022). Similarly, Pawelczyk et al.
 113 (2022) show that CEs and AEs are equivalent under certain conditions and derive theoretical upper bounds on distances
 114 between them.

115 Two recent works are closely related to ours in that they use counterfactuals during training with the explicit goal of
 116 affecting certain properties of the post-hoc counterfactual explanations. Firstly, Ross, Lakkaraju, and Bastani (2024)
 117 propose a way to train models that guarantee individual recourse to some positive target class with high probability.
 118 Their approach builds on adversarial training by explicitly inducing susceptibility to targeted adversarial examples for
 119 the positive class. Additionally, the proposed method allows for imposing a set of actionability constraints ex-ante.
 120 For example, users can specify that certain features (e.g., *age*, *gender*) are immutable. Secondly, Guo, Nguyen, and
 121 Yadav (2023) are the first to propose an end-to-end training pipeline that includes counterfactual explanations as part
 122 of the training procedure. In particular, they propose a specific network architecture that includes a predictor and CE
 123 generator network, where the parameters of the CE generator network are learnable. Counterfactuals are generated

124 during each training iteration and fed back to the predictor network. In contrast to Guo, Nguyen, and Yadav (2023),
 125 we impose no restrictions on the neural network architecture at all.

126 2.2 Beyond Robustness

127 Improving the adversarial robustness of models is not the only path towards aligning representations with plausible
 128 explanations. In a work closely related to this one, Altmeyer et al. (2024) show that explainability can be improved
 129 through model averaging and refined model objectives. The authors propose a way to generate counterfactuals that
 130 are maximally faithful to the model in that they are consistent with what the model has learned about the underlying
 131 data. Formally, they rely on tools from energy-based modelling to minimize the divergence between the distribution
 132 of counterfactuals and the conditional posterior over inputs learned by the model. Their proposed counterfactual
 133 explainer, *ECCCo*, yields plausible explanations if and only if the underlying model has learned representations that
 134 align with them. The authors find that both deep ensembles (Lakshminarayanan, Pritzel, and Blundell 2017) and joint
 135 energy-based models (JEMs) (Grathwohl et al. 2020) tend to do well in this regard.

136 Once again it helps to look at these findings through the lens of representation learning with high degrees of freedom.
 137 Deep ensembles are approximate Bayesian model averages, which are most called for when models are underspecified
 138 by the available data (Wilson 2020). Averaging across solutions mitigates the aforementioned risk of relying on a
 139 single locally optimal representations that corresponds to semantically meaningless explanations for the data. Previous
 140 work by Schut et al. (2021) similarly found that generating plausible (“interpretable”) counterfactual explanations is
 141 almost trivial for deep ensembles that have also undergone adversarial training. The case for JEMs is even clearer:
 142 they involve a hybrid objective that induces both high predictive performance and generative capacity (Grathwohl et al.
 143 2020). This is closely related to the idea of aligning models with plausible explanations and has inspired our proposed
 144 counterfactual training objective, as we explain in Section 3.

145 3 Counterfactual Training

146 Counterfactual training (CT) combines ideas from adversarial training, energy-based modelling and counterfactuals
 147 explanations with the explicit goal of aligning representations with plausible explanations that comply with user re-
 148 quirements. In the context of CEs, plausibility has broadly been defined as the degree to which counterfactuals comply
 149 with the underlying data-generating process (Poyiadzi et al. 2020; Guidotti 2022; Altmeyer et al. 2024). Plausibility
 150 is a necessary but insufficient condition for using CEs to provide algorithmic recourse (AR) to individuals (negatively)
 151 affected by opaque models. For AR recommendations to be actionable, they need to not only result in plausible coun-
 152 terfactuals but also be attainable. A plausible CE for a rejected 20-year-old loan applicant, for example, might reveal
 153 that their application would have been accepted, if only they were 20 years older. Ignoring all other features, this
 154 would comply with the definition of plausibility if 40-year-old individuals were in fact more credit-worthy on average
 155 than young adults. But of course this CE does not qualify for providing actionable recourse to the applicant since *age*
 156 is not a (directly) mutable feature. CT aims to improve model explainability by aligning models with counterfactuals
 157 that meet both desiderata: plausibility and actionability. Formally, we define explainability as follows:

158 **Definition 3.1** (Model Explainability). Let $M_\theta : \mathcal{X} \mapsto \mathcal{Y}$ denote a supervised classification model that maps from the
 159 D -dimensional input space \mathcal{X} to representations $\phi(\mathbf{x}; \theta)$ and finally to the K -dimensional output space \mathcal{Y} . Assume
 160 that for any given input-output pair $\{\mathbf{x}, \mathbf{y}\}_i$ there exists a counterfactual $\mathbf{x}' = \mathbf{x} + \Delta : M_\theta(\mathbf{x}') = \mathbf{y}^+ \neq \mathbf{y} = M_\theta(\mathbf{x})$
 161 where $\arg \max_y \mathbf{y}^+ = y^+$ and y^+ denotes the index of the target class.

162 We say that M_θ is **explainable** to the extent that faithfully generated counterfactuals are plausible (i.e., consistent with
 163 the data) and actionable. Formally, we define these properties as follows:

- 164 1. (Plausibility) $\int^A p(\mathbf{x}' | \mathbf{y}^+) d\mathbf{x} \rightarrow 1$ where A is some small region around \mathbf{x}' .
- 165 2. (Actionability) Permutations Δ are subject to some actionability constraints.

166 We consider counterfactuals as faithful to the extent that they are consistent with what the model has learned about the
 167 input data. Let $p_\theta(\mathbf{x} | \mathbf{y}^+)$ denote the conditional posterior over inputs, then formally:

- 168 3. (Faithfulness) $\int^A p_\theta(\mathbf{x}' | \mathbf{y}^+) d\mathbf{x} \rightarrow 1$ where A is defined as above.

169 The characterization of faithfulness and plausibility in Definition 3.1 is the same as in Altmeyer et al. (2024), with
 170 adapted notation. Actionability constraints in Definition 3.1 vary and depend on the context in which M_θ is deployed.
 171 In this work, we focus on domain and mutability constraints for individual features x_d for $d = 1, \dots, D$. We limit
 172 ourselves to classification tasks for reasons discussed in Section 5.

173 **3.1 Our Proposed Objective**

174 Let \mathbf{x}'_t for $t = 0, \dots, T$ denote a counterfactual explanation generated through gradient descent over T iterations as
 175 initially proposed by Wachter, Mittelstadt, and Russell (2017). For our purposes, we let T vary and consider the
 176 counterfactual search to be converged as soon as the predicted probability for the target class has reached a pre-
 177 determined threshold τ : $\mathcal{S}(\mathbf{M}_\theta(\mathbf{x}'))[y^+] \geq \tau$, where \mathcal{S} is the softmax function.²

178 To train models with high explainability as defined in Definition 3.1, we propose to leverage counterfactuals in the
 179 following objective:

$$\begin{aligned} \min_{\theta} & \text{yloss}(\mathbf{M}_\theta(\mathbf{x}), \mathbf{y}) + \lambda_{\text{div}} \text{div}(\mathbf{x}, \mathbf{x}'_T, y; \theta) + \lambda_{\text{adv}} \text{advloss}(\mathbf{M}_\theta(\mathbf{x}'_{\leq T}), \mathbf{y}) \\ & + \lambda_{\text{reg}} \text{ridge}(\mathbf{x}, \mathbf{x}'_T, y; \theta) \end{aligned} \quad (1)$$

180 where $\text{yloss}(\cdot)$ is a classification loss that induces discriminative performance (e.g., cross-entropy). The second and
 181 third terms in Equation 1 are explained in detail below. For now, they can be sufficiently described as inducing explain-
 182 ability directly and indirectly by penalizing: (1) the contrastive divergence, $\text{div}(\cdot)$, between mature counterfactuals \mathbf{x}'_T
 183 and observed samples x and, (2) the adversarial loss, $\text{advloss}(\cdot)$, with respect to nascent counterfactuals $\mathbf{x}'_{t \leq T}$. Fi-
 184 nally, $\text{ridge}(\cdot)$ denotes a Ridge penalty (ℓ_2 -norm) that regularizes the magnitude of the energy terms involved in $\text{div}(\cdot)$
 185 (Du and Mordatch 2020). The trade-off between the components can be governed by adjusting the strengths of the
 186 penalties λ_{div} , λ_{adv} and λ_{reg} .

187 **3.2 Directly Inducing Explainability with Contrastive Divergence**

188 Grathwohl et al. (2020) observe that any classifier can be re-interpreted as a joint energy-based model (JEM) that
 189 learns to discriminate output classes conditional on the observed (training) samples from $p(\mathbf{x})$ and the generated
 190 samples from $p_\theta(\mathbf{x})$. The authors show that JEMs can be trained to perform well at both tasks by directly maximizing
 191 the joint log-likelihood factorized as $\log p_\theta(\mathbf{x}, \mathbf{y}) = \log p_\theta(\mathbf{y}|\mathbf{x}) + \log p_\theta(\mathbf{x})$. The first term can be optimized using
 192 conventional cross-entropy as in Equation 1. Then, to optimize $\log p_\theta(\mathbf{x})$ Grathwohl et al. (2020) minimize the
 193 contrastive divergence between these observed samples from $p(\mathbf{x})$ and generated samples from $p_\theta(\mathbf{x})$.

194 A key empirical finding in Altmeyer et al. (2024) was that JEMs tend to do well with respect to the plausibility
 195 objective in Definition 3.1. This follows directly if we consider samples drawn from $p_\theta(\mathbf{x})$ as counterfactuals because
 196 the JEM objective effectively minimizes the divergence between the conditional posterior and $p(\mathbf{x}|y^+)$. To generate
 197 samples, Grathwohl et al. (2020) rely on Stochastic Gradient Langevin Dynamics (SGLD) using an uninformative
 198 prior for initialization but we depart from their methodology. Instead of SGLD, we propose to use counterfactual
 199 explainers to generate counterfactuals of observed training samples. Specifically, we have:

$$\text{div}(\mathbf{x}, \mathbf{x}'_T, y; \theta) = \mathcal{E}_\theta(\mathbf{x}, y) - \mathcal{E}_\theta(\mathbf{x}'_T, y) \quad (2)$$

200 where $\mathcal{E}_\theta(\cdot)$ denotes the energy function. We set $\mathcal{E}_\theta(\mathbf{x}, y) = -\mathbf{M}_\theta(\mathbf{x}^+)[y^+]$ where y^+ denotes the index of the
 201 randomly drawn target class, $y^+ \sim p(y)$, and \mathbf{x}^+ denotes an observed sample from target domain: $\mathbf{X}^+ = \{\mathbf{x} : y = y^+\}$.
 202 Conditional on the target class y^+ , \mathbf{x}'_T denotes a mature counterfactual for a randomly sampled factual from a non-
 203 target class generated with a gradient-based CE generator for up to T iterations. Mature counterfactuals are ones that
 204 have either reached convergence wrt. the decision threshold τ or exhausted T .

205 Intuitively, the gradient of Equation 2 decreases the energy of observed training samples (positive samples) while
 206 increasing the energy of counterfactuals (negative samples) (Du and Mordatch 2020). As the counterfactuals get more
 207 plausible (Definition 3.1) during training, these opposing effects gradually balance each other out (Lippe 2024).

208 The departure from SGLD allows us to tap into the vast repertoire of explainers that have been proposed in the literature
 209 to meet different desiderata. For example, many methods facilitate the imposition of domain and mutability constraints.
 210 In principle, any existing approach for generating counterfactual explanations is viable, so long as it does not violate
 211 the faithfulness condition. Like JEMs (Murphy 2022), CT can be considered a form of contrastive representation
 212 learning.

213 **3.3 Indirectly Inducing Explainability with Adversarial Robustness**

214 Based on our analysis in Section 2, counterfactuals \mathbf{x}' can be repurposed as additional training samples (Luu and Inoue
 215 2023; Balashankar et al. 2023) or AEs (Freiesleben 2022; Pawelczyk et al. 2022). This leaves some flexibility with
 216 respect to the choice for $\text{advloss}(\cdot)$ in Equation 1. An intuitive functional form, but likely not the only sensible choice,
 217 is inspired by adversarial training:

²For detailed background information on gradient-based counterfactual search and convergence see ?@sec-app-ce.

$$\text{advloss}(\mathbf{M}_\theta(\mathbf{x}'_{t \leq T}), \mathbf{y}; \varepsilon) = \text{yloss}(\mathbf{M}_\theta(\mathbf{x}'_{t_\varepsilon}), \mathbf{y})$$

$$t_\varepsilon = \max_t \{t : \|\Delta_t\|_\infty < \varepsilon\}$$
(3)

218 Under this choice, we consider nascent counterfactuals $\mathbf{x}'_{t \leq T}$ as AEs as long as the magnitude of the perturbation to
 219 any single feature is at most ε . This is closely aligned with Szegedy et al. (2013) who define an adversarial attack as
 220 an “imperceptible non-random perturbation”. Thus, we choose to work with a different distinction between CE and
 221 AE than Freiesleben (2022) who consider misclassification as the key distinguishing feature of AE. One of the key
 222 observations in this work is that we can leverage CEs during training and get adversarial examples essentially for free.

223 3.4 Encoding Actionability Constraints

224 Many existing counterfactual explainers support domain and mutability constraints out-of-the-box. In fact, both types
 225 of constraints can be implemented for any counterfactual explainer that relies on gradient descent in the feature space
 226 for optimization (Altmeyer, Deursen, et al. 2023). In this context, domain constraints can be imposed by simply
 227 projecting counterfactuals back to the specified domain, if the previous gradient step resulted in updated feature values
 228 that were out-of-domain. Mutability constraints can similarly be enforced by setting partial derivatives to zero to
 229 ensure that features are only perturbed in the allowed direction, if at all.

230 Since such actionability constraints are binding at test time, we should also impose them when generating \mathbf{x}' during
 231 each training iteration to inform model representations. Through their effect on \mathbf{x}' , both types of constraints influence
 232 model outcomes via Equation 2. Here it is crucial that we avoid penalizing implausibility that arises due to mutability
 233 constraints. For any mutability-constrained feature d this can be achieved by enforcing $\mathbf{x}[d] - \mathbf{x}'[d] := 0$ whenever
 234 perturbing $\mathbf{x}'[d]$ in the direction of $\mathbf{x}[d]$ would violate mutability constraints. Specifically, we set $\mathbf{x}[d] := \mathbf{x}'[d]$ if:

- 235 1. Feature d is strictly immutable in practice.
- 236 2. We have $\mathbf{x}[d] > \mathbf{x}'[d]$, but feature d can only be decreased in practice.
- 237 3. We have $\mathbf{x}[d] < \mathbf{x}'[d]$, but feature d can only be increased in practice.

238 From a Bayesian perspective, setting $\mathbf{x}[d] := \mathbf{x}'[d]$ can be understood as assuming a point mass prior for $p(\mathbf{x})$ with
 239 respect to feature d . Intuitively, we think of this simply in terms ignoring implausibility costs with respect to immutable
 240 features, which effectively forces the model to instead seek plausibility with respect to the remaining features. This
 241 in turn results in lower overall sensitivity to immutable features, which we demonstrate empirically for different
 242 classifiers in Section 4. Under certain conditions, this results holds theoretically.³

243 **Proposition 3.1** (Protecting Immutable Features). *Let $f_\theta(\mathbf{x}) = \mathcal{S}(\mathbf{M}_\theta(\mathbf{x})) = \mathcal{S}(\Theta\mathbf{x})$ denote a linear classifier with
 244 softmax activation \mathcal{S} (i.e., multinomial logistic regression) where $y \in \{1, \dots, K\} = \mathcal{K}$ and $\mathbf{x} \in \mathbb{R}^D$. If we assume
 245 multivariate Gaussian class densities with common diagonal covariance matrix $\Sigma_k = \Sigma$ for all $k \in \mathcal{K}$, then protecting
 246 an immutable feature from the contrastive divergence penalty (Equation 2) will result in lower classifier sensitivity to
 247 that feature relative to the remaining features, provided that at least one of those is discriminative and mutable.*

248 It is worth highlighting that Proposition 3.1 assumes independence of features. This raises a valid concern about
 249 the effect of protecting immutable features in the presence of proxies that remain unprotected. We address this in
 250 Section 5.

251 3.5 Example: influence of counterfactual training on explainability

252 To better convey the intuition underlying our proposed method, we illustrate different model outcomes in Example 3.1.

253 **Example 3.1** (Prediction of Consumer Credit Default). Suppose we are interested in predicting the likelihood that
 254 loan applicants default on their credit. We have access to historical data on previous loan takers comprised of a binary
 255 outcome variable ($y \in \{1 = \text{default}, 2 = \text{no default}\}$) with two input features: (1) the subjects’ *age*, which we define
 256 as immutable, and (2) the subjects’ existing level of *debt*, which we define as mutable.

257 We have simulated this scenario using synthetic data with two independent features and Gaussian class-conditional
 258 densities in Figure 1. The four panels in Figure 1 show the outcomes for different training procedures using the same
 259 model architecture each time (a linear classifier). In each case, we show the decision boundary (in green) and the
 260 training data colored according to their ground-truth label: orange points belong to the target class, $y^+ = 2$, blue
 261 points belong to the non-target class, $y^- = 1$. Stars indicate counterfactuals in the target class generated at test time
 262 using generic gradient descent until convergence.

³For the proof, see the supplementary appendix.

263 In panel (a), we have trained our model conventionally, and we do not impose mutability constraints at test time.
 264 The generated counterfactuals are all valid, but not plausible: they do not comply with the distribution of the factual
 265 samples in the target class to the point where they are clearly distinguishable from the ground-truth data. In panel (b),
 266 we have trained our model with counterfactual training, once again without any mutability constraints. We observe
 267 that the counterfactuals are highly plausible, meeting the first objective of Definition 3.1.

268 In panel (c), we have used conventional training again, this time imposing the mutability constraint on *age* at test time.
 269 Counterfactuals are valid but involve some substantial reductions in *debt* for some individuals (very young applicants).
 270 By comparison, counterfactual paths are shorter on average in panel (d), where we have used counterfactual training
 271 and protected the immutable feature as described in Section 3.4. We observe that due to the classifier's lower sensitivity
 272 to *age*, recourse recommendations with respect to *debt* are much more homogenous and do not disproportionately
 273 punish younger individuals. The counterfactuals are also plausible with respect to the mutable feature. Thus, we
 274 consider the model in panel (d) as the most explainable according to Definition 3.1.

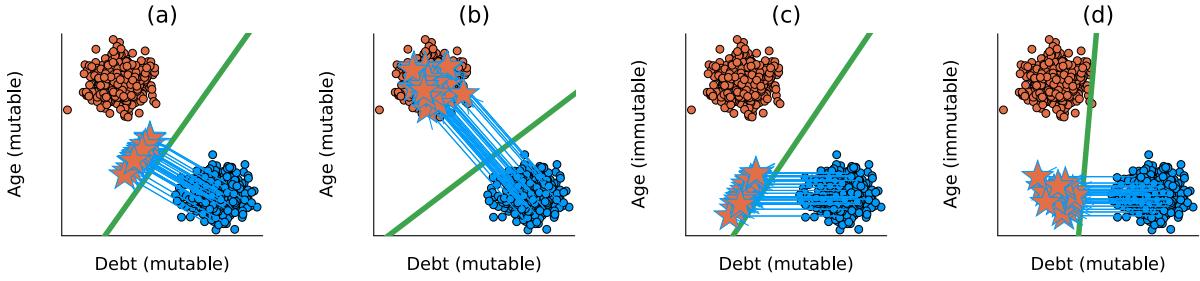


Figure 1: Illustration for Example 3.1 of how CT improves model explainability.

275 4 Experiments

276 In this section, we present experiments that we have conducted in order to answer the following research questions:

277 **Research Question 4.1** (Plausibility). *To what extent does our proposed counterfactual training objective (Equation 1) induce models to learn plausible explanations?*

279 **Research Question 4.2** (Actionability). *To what extent does our proposed counterfactual training objective (Equation 1) yield more favorable algorithmic recourse outcomes in the presence of actionability constraints?*

281 Beyond this, we are also interested in understanding how robust our answers to RQ 4.1 and RQ 4.2 are:

282 **Research Question 4.3** (Hyperparameters). *What are the effects of different hyperparameter choices wrt. Equation 1?*

283 4.1 Experimental Setup

284 4.1.1 Evaluation

285 Our key outcome of interest is how well models perform with respect to explainability (Definition 3.1): to this end, we
 286 focus primarily on the plausibility and cost of faithfully generated counterfactuals at test time. To measure the cost of
 287 counterfactuals, we follow the standard convention of using distances (ℓ_1 -norm) between factuals and counterfactuals
 288 as a proxy. For plausibility, we assess how similar counterfactuals are to observed samples in the target domain. We
 289 rely on the distance-based metric used by Altmeier et al. (2024),

$$\text{implaus}_{\text{dist}}(\mathbf{x}', \mathbf{X}^+) = \frac{1}{|\mathbf{X}^+|} \sum_{\mathbf{x} \in \mathbf{X}^+} \text{dist}(\mathbf{x}', \mathbf{x}) \quad (4)$$

290 and introduce a novel divergence metric,

$$\text{implaus}_{\text{div}}(\mathbf{X}', \mathbf{X}^+) = \text{MMD}(\mathbf{X}', \mathbf{X}^+) \quad (5)$$

291 where \mathbf{X}' denotes a set of multiple counterfactuals and $\text{MMD}(\cdot)$ is an unbiased estimate of the squared population
 292 maximum mean discrepancy (Gretton et al. 2012). The metric in Equation 5 is equal to zero iff $\mathbf{X}' = \mathbf{X}^+$.

293 In addition to cost and plausibility, we also compute other standard metrics to evaluate counterfactuals at test time in-
 294 cluding validity and redundancy. Finally, we also assess the predictive performance of models using standard metrics.

295 We run the experiments with three CE generators: *Generic* of Wachter, Mittelstadt, and Russell (2017) as a simple
 296 baseline approach, *REVISE* (Joshi et al. 2019) that aims to generate plausible counterfactuals using a surrogate Variational
 297 Autoencoder (VAE), and *ECCo*—the generator of Altmeyer et al. (2023) but without the conformal prediction
 298 component—as a method that directly targets both faithfulness and plausibility of the CEs.

299 4.2 Experimental Results

300 4.2.1 Plausibility

301 4.2.2 Actionability

302 4.2.3 Impact of hyperparameter settings

303 We extensively test the impact of three types of hyperparameters on the proposed training regime. Our complete results
 304 are available in the technical appendix; this section focuses on the main findings.

305 **Hyperparameters of the CE generators.** First, we observe that CT is highly sensitive to hyperparameter settings but
 306 (a) there are manageable patterns and (b) we can typically identify settings that improve either plausibility or cost, and
 307 commonly both of them at the same time. Second, we note that the choice of a CE generator has a major impact on
 308 the results. For example, *REVISE* tends to perform the worst, most likely because it uses a surrogate VAE to generate
 309 counterfactuals which impedes faithfulness (Altmeyer et al. 2024). Third, increasing T , the maximum number of
 310 steps, generally yields better outcomes because more CEs can mature in each training epoch. Fourth, the impact of τ ,
 311 the required decision threshold is more difficult to predict. On “harder” datasets it may be difficult to satisfy high τ for
 312 any given sample (i.e., also factuals) and so increasing this threshold does not seem to correlate with better outcomes.
 313 In fact, we have generally found that a choice of $\tau = 0.5$ leads to optimal results because it is associated with high
 314 proportions of mature counterfactuals.

315 **Hyperparameters for penalties.** We find that the strength of the energy regularization, λ_{reg} is highly impactful; energy
 316 must be sufficiently regularized to avoid poor performance in terms of decreased plausibility and increased costs. The
 317 sensitivity with respect to λ_{div} and λ_{adv} is much less evident. While high values of λ_{reg} may increase the variability in
 318 outcomes when combined with high values of λ_{div} or λ_{adv} , this effect is not very pronounced.

319 **Other hyperparameters.** We observe that the effectiveness and stability of CT is positively associated with the number
 320 of counterfactuals generated during each training epoch. We also confirm that a higher number of training epochs is
 321 beneficial. Interestingly, we find that it is not necessary to employ CT during the entire training phase to achieve the
 322 desired improvements in explainability. When training models conventionally during the first 50% of epochs before
 323 switching to CT for the next 50% of epochs, we observed positive results. Put differently, CT may be a way to improve
 324 the explainability of models in a fine-tuning manner.

325 5 Discussion

326 We begin the discussion by addressing the direct extensions of the counterfactual training approach in Section 5.1.
 327 Then, we look at its broader limitations and challenges in Section 5.2.

328 5.1 Future research

329 **CT is defined only for classification settings.** Our formulation relies on the distinction between non-target class(es)
 330 y^- and target class(es) y^+ to generate counterfactuals through Equation 1. While y^- and y^+ can be arbitrarily defined
 331 by the user, CT requires the output space \mathcal{Y} to be discrete. Thus, it applies to binary and multi-class classification but
 332 it is not well-defined for other ML tasks where the change in outcome with respect to a decision threshold τ cannot
 333 be readily quantified. In fact, this is a common restriction in research on CEs and AR that predominantly focuses on
 334 classification models. Although other settings have attracted some interest (e.g., regression in Spooner et al. 2021;
 335 Zhao, Broelemann, and Kasneci 2023), there is still no consensus on what constitutes a counterfactual in such settings.

336 **CT is subject to training instabilities.** Joint energy-based models are susceptible to instabilities during training (Grath-
 337 wohl et al. 2020) and even though we depart from the SGLD-based sampling, we still encounter major variability in
 338 the outcomes. CT is exposed to two potential sources of instabilities: (1) the energy-based contrastive divergence term
 339 in Equation 2, and (2) the underlying counterfactual explainers. For example, Altmeyer et al. (2023) recognize this
 340 to be a challenge for *ECCo* and so it may have downstream impacts on our proposed method. Still, we find that
 341 training instabilities can be successfully mitigated by regularizing energy (λ_{reg}), generating a sufficiently large number
 342 of counterfactuals during each training epoch and including only mature counterfactuals for contrastive divergence.

343 **CT is sensitive to hyperparameter selection.** As discussed in Section 4.2.3, our method benefits from tuning certain
 344 key hyperparameters. In this work, we have relied exclusively on grid search for this task. Future work on CT could
 345 benefit from investigating more sophisticated approaches towards hyperparameter tuning. Notably, CT is iterative

346 which makes a variety of methods applicable, including Bayesian (e.g., [Snoek, Larochelle, and Adams 2012](#)) or
 347 gradient-based (e.g., [Franceschi et al. 2017](#)) optimization.

348 5.2 Limitations and challenges

349 ***CT increases the training time of models.*** Counterfactual training promotes explainability through CEs and robustness
 350 through AEs at the cost of longer training times compared to conventional training regimes. While higher numbers
 351 of iterations and counterfactuals per iteration positively impact the quality of found solutions, they also increase
 352 the required amount of computations. We find that relatively small grids with 270 settings can take almost four
 353 hours for more demanding datasets on a high-performance computing cluster with 34 2GB CPUs (see details in
 354 [?@sec-hardware](#)). However, there are three factors that attenuate the impact of this limitation. First, CT provides
 355 counterfactual explanations for the training samples essentially for free, which may be beneficial in many ADM
 356 systems. Second, we find that CT can retain its value when used as a “fine-tuning” training regime for conventionally-
 357 trained models. Third, in principle, CT yields itself to parallel execution, which we have leveraged for our own
 358 experiments.

359 ***Immutable features may have proxies.*** In Proposition 3.1 we define an approach to protect immutable features and
 360 thus increase the actionability of the generated counterfactuals. However, this approach requires that model owners
 361 define the mutability constraints for (all) features considered by the model. Even with sufficient domain knowledge
 362 to protect all immutable features—ones that cannot be changed at all and ones that cannot be reasonably expected
 363 to change—there may exist proxies that are theoretically mutable (and hence should not be protected) but preserve
 364 enough information about the principals to counteract the protections. As one example, consider the Adult dataset
 365 used in our experiments where the mutable education status is a proxy for the immutable age, in that the attainment of
 366 degrees is correlated with age. Delineating actionability is a major undecided challenge in the AR literature (see, e.g.,
 367 [Venkatasubramanian and Alfano 2020](#)) impacting the capacity of CT to increase the explainability of the model.

368 ***Interventions on features may have downstream impacts on fairness.*** Related to the point above, we provide a
 369 tool that allows practitioners to modify the sensitivity of a model with respect to certain features, which may have
 370 implication for the fair and equitable treatment of individuals subject to automated decisions. As protecting a set of
 371 features leads the model to assign higher relative importance to unprotected features, model owners could misuse our
 372 solution by enforcing explanations based on features that are more difficult to modify by some (group of) individuals.
 373 For example, consider again the Adult dataset where features such as workclass or education may be more difficult
 374 to change for underprivileged groups. When applied irresponsibly, counterfactual training could result in an unfairly
 375 assigned burden of recourse (e.g., [Sharma, Henderson, and Ghosh 2020](#)), threatening the equality of opportunity in
 376 the system ([Bell et al. 2024](#)) and potentially reinforcing social segregation ([Gao and Lakkaraju 2023](#)). Still, as the
 377 referenced publications indicate, such phenomena are not specific to CT; all types of ADM solutions without strong
 378 external protections have been recognized to promote harmful power dynamics ([Maas 2023](#)).

379 6 Conclusion

380 References

- 381 Abbasnejad, Ehsan, Damien Teney, Amin Parvaneh, Javen Shi, and Anton van den Hengel. 2020. “Counterfactual
 382 Vision and Language Learning.” In *2020 IEEE/CVF Conference on Computer Vision and Pattern Recognition
 383 (CVPR)*, 10041–51. <https://doi.org/10.1109/CVPR42600.2020.01006>.
- 384 Altmeyer, Patrick, Arie van Deursen, et al. 2023. “Explaining Black-Box Models Through Counterfactuals.” In
 385 *Proceedings of the JuliaCon Conferences*, 1:130. 1.
- 386 Altmeyer, Patrick, Mojtaba Farmanbar, Arie van Deursen, and Cynthia C. S. Liem. 2023. “Faithful Model Explanations
 387 Through Energy-Constrained Conformal Counterfactuals.” <https://arxiv.org/abs/2312.10648>.
- 388 Altmeyer, Patrick, Mojtaba Farmanbar, Arie van Deursen, and Cynthia CS Liem. 2024. “Faithful Model Explanations
 389 Through Energy-Constrained Conformal Counterfactuals.” In *Proceedings of the AAAI Conference on Artificial
 390 Intelligence*, 38:10829–37. 10.
- 391 Augustin, Maximilian, Alexander Meinke, and Matthias Hein. 2020. “Adversarial Robustness on in-and Out-
 392 Distribution Improves Explainability.” In *European Conference on Computer Vision*, 228–45. Springer.
- 393 Balashankar, Ananth, Xuezhi Wang, Yao Qin, Ben Packer, Nithum Thain, Ed Chi, Jilin Chen, and Alex Beutel. 2023.
 394 “Improving Classifier Robustness Through Active Generative Counterfactual Data Augmentation.” In *Findings of
 395 the Association for Computational Linguistics: EMNLP 2023*, 127–39.
- 396 Bell, Andrew, Joao Fonseca, Carlo Abrate, Francesco Bonchi, and Julia Stoyanovich. 2024. “Fairness in Algorithmic
 397 Recourse Through the Lens of Substantive Equality of Opportunity.” <https://arxiv.org/abs/2401.16088>.
- 398 Du, Yilun, and Igor Mordatch. 2020. “Implicit Generation and Generalization in Energy-Based Models.” <https://arxiv.org/abs/1903.08689>.

- 400 Franceschi, Luca, Michele Donini, Paolo Frasconi, and Massimiliano Pontil. 2017. “Forward and Reverse Gradient-
 401 Based Hyperparameter Optimization.” In *Proceedings of the 34th International Conference on Machine Learning*,
 402 edited by Doina Precup and Yee Whye Teh, 70:1165–73. Proceedings of Machine Learning Research. PMLR.
 403 <https://proceedings.mlr.press/v70/franceschi17a.html>.
- 404 Frankle, Jonathan, and Michael Carbin. 2019. “The Lottery Ticket Hypothesis: Finding Sparse, Trainable Neural Net-
 405 works.” In *International Conference on Learning Representations*. <https://openreview.net/forum?id=rJl-b3RcF7>.
- 406 Freiesleben, Timo. 2022. “The Intriguing Relation Between Counterfactual Explanations and Adversarial Examples.”
 407 *Minds and Machines* 32 (1): 77–109.
- 408 Gao, Ruijiang, and Himabindu Lakkaraju. 2023. “On the Impact of Algorithmic Recourse on Social Segregation.”
 409 In *Proceedings of the 40th International Conference on Machine Learning*. ICML’23. Honolulu, Hawaii, USA:
 410 JMLR.org.
- 411 Goodfellow, Ian J, Jonathon Shlens, and Christian Szegedy. 2014. “Explaining and Harnessing Adversarial Examples.”
 412 <https://arxiv.org/abs/1412.6572>.
- 413 Goodfellow, Ian, Yoshua Bengio, and Aaron Courville. 2016. *Deep Learning*. MIT Press.
- 414 Grathwohl, Will, Kuan-Chieh Wang, Joern-Henrik Jacobsen, David Duvenaud, Mohammad Norouzi, and Kevin Swer-
 415 sky. 2020. “Your Classifier Is Secretly an Energy Based Model and You Should Treat It Like One.” In *International
 416 Conference on Learning Representations*.
- 417 Gretton, Arthur, Karsten M Borgwardt, Malte J Rasch, Bernhard Schölkopf, and Alexander Smola. 2012. “A Kernel
 418 Two-Sample Test.” *The Journal of Machine Learning Research* 13 (1): 723–73.
- 419 Guidotti, Riccardo. 2022. “Counterfactual Explanations and How to Find Them: Literature Review and Benchmark-
 420 ing.” *Data Mining and Knowledge Discovery*, 1–55.
- 421 Guo, Hangzhi, Thanh H. Nguyen, and Amulya Yadav. 2023. “CounterNet: End-to-End Training of Prediction Aware
 422 Counterfactual Explanations.” In *Proceedings of the 29th ACM SIGKDD Conference on Knowledge Discovery
 423 and Data Mining*, 577–89. KDD ’23. New York, NY, USA: Association for Computing Machinery. <https://doi.org/10.1145/3580305.3599290>.
- 425 Joshi, Shalmali, Oluwasanmi Koyejo, Warut Vigitbenjaronk, Been Kim, and Joydeep Ghosh. 2019. “Towards Realistic
 426 Individual Recourse and Actionable Explanations in Black-Box Decision Making Systems.” <https://arxiv.org/abs/1907.09615>.
- 428 Kolter, Zico. 2023. “Keynote Addresses: SaTML 2023 .” In *2023 IEEE Conference on Secure and Trustworthy
 429 Machine Learning (SaTML)*, xvi–. Los Alamitos, CA, USA: IEEE Computer Society. <https://doi.org/10.1109/SaTML54575.2023.00009>.
- 431 Lakshminarayanan, Balaji, Alexander Pritzel, and Charles Blundell. 2017. “Simple and Scalable Predictive Uncer-
 432 tainty Estimation Using Deep Ensembles.” *Advances in Neural Information Processing Systems* 30.
- 433 Lippe, Phillip. 2024. “UvA Deep Learning Tutorials.” <https://uvadlc-notebooks.readthedocs.io/en/latest/>.
- 434 Luu, Hoai Linh, and Naoya Inoue. 2023. “Counterfactual Adversarial Training for Improving Robustness of Pre-
 435 Trained Language Models.” In *Proceedings of the 37th Pacific Asia Conference on Language, Information and
 436 Computation*, 881–88.
- 437 Maas, Jonne. 2023. “Machine Learning and Power Relations.” *AI & SOCIETY* 38 (4): 1493–1500.
- 438 McGregor, Sean. 2021. “Preventing repeated real world AI failures by cataloging incidents: The AI incident database.”
 439 In *Proceedings of the AAAI Conference on Artificial Intelligence*, 35:15458–63. 17.
- 440 Morcos, Ari S., Haonan Yu, Michela Paganini, and Yuandong Tian. 2019. “One Ticket to Win Them All: Gener-
 441 alizing Lottery Ticket Initializations Across Datasets and Optimizers.” In *Proceedings of the 33rd International
 442 Conference on Neural Information Processing Systems*. Red Hook, NY, USA: Curran Associates Inc.
- 443 Murphy, Kevin P. 2022. *Probabilistic Machine Learning: An Introduction*. MIT Press.
- 444 O’Neil, Cathy. 2016. *Weapons of Math Destruction: How Big Data Increases Inequality and Threatens Democracy*.
 445 Crown.
- 446 Pawelczyk, Martin, Chirag Agarwal, Shalmali Joshi, Sohini Upadhyay, and Himabindu Lakkaraju. 2022. “Exploring
 447 Counterfactual Explanations Through the Lens of Adversarial Examples: A Theoretical and Empirical Analysis.”
 448 In *Proceedings of the 25th International Conference on Artificial Intelligence and Statistics*, edited by Gustau
 449 Camps-Valls, Francisco J. R. Ruiz, and Isabel Valera, 151:4574–94. Proceedings of Machine Learning Research.
 450 PMLR. <https://proceedings.mlr.press/v151/pawelczyk22a.html>.
- 451 Poyiadzi, Rafael, Kacper Sokol, Raul Santos-Rodriguez, Tijl De Bie, and Peter Flach. 2020. “FACE: Feasible and
 452 Actionable Counterfactual Explanations.” In *Proceedings of the AAAI/ACM Conference on AI, Ethics, and Society*,
 453 344–50.
- 454 Ross, Alexis, Himabindu Lakkaraju, and Osbert Bastani. 2024. “Learning Models for Actionable Recourse.” In
 455 *Proceedings of the 35th International Conference on Neural Information Processing Systems*. NIPS ’21. Red
 456 Hook, NY, USA: Curran Associates Inc.
- 457 Sauer, Axel, and Andreas Geiger. 2021. “Counterfactual Generative Networks.” <https://arxiv.org/abs/2101.06046>.

- 458 Schut, Lisa, Oscar Key, Rory Mc Grath, Luca Costabello, Bogdan Sacaleanu, Yarin Gal, et al. 2021. “Generating
 459 Interpretable Counterfactual Explanations By Implicit Minimisation of Epistemic and Aleatoric Uncertainties.” In
 460 *International Conference on Artificial Intelligence and Statistics*, 1756–64. PMLR.
- 461 Sharma, Shubham, Jette Henderson, and Joydeep Ghosh. 2020. “CERTIFAI: A Common Framework to Provide
 462 Explanations and Analyse the Fairness and Robustness of Black-Box Models.” In *Proceedings of the AAAI/ACM
 463 Conference on AI, Ethics, and Society*, 166–72. AIES ’20. New York, NY, USA: Association for Computing
 464 Machinery. <https://doi.org/10.1145/3375627.3375812>.
- 465 Snoek, Jasper, Hugo Larochelle, and Ryan P. Adams. 2012. “Practical Bayesian Optimization of Machine Learning
 466 Algorithms.” In *Advances in Neural Information Processing Systems*, edited by F. Pereira, C. J. Burges, L. Bottou,
 467 and K. Q. Weinberger. Vol. 25. Curran Associates, Inc. https://proceedings.neurips.cc/paper_files/paper/2012/file/05311655a15b75fab86956663e1819cd-Paper.pdf.
- 468 Spooner, Thomas, Danial Dervovic, Jason Long, Jon Shepard, Jiahao Chen, and Daniele Magazzeni. 2021. “Counter-
 469 factual Explanations for Arbitrary Regression Models.” *CoRR* abs/2106.15212. <https://arxiv.org/abs/2106.15212>.
- 470 Szegedy, Christian, Wojciech Zaremba, Ilya Sutskever, Joan Bruna, Dumitru Erhan, Ian Goodfellow, and Rob Fergus.
 471 2013. “Intriguing Properties of Neural Networks.” <https://arxiv.org/abs/1312.6199>.
- 472 Teney, Damien, Ehsan Abbasnedjad, and Anton van den Hengel. 2020. “Learning What Makes a Difference from
 473 Counterfactual Examples and Gradient Supervision.” In *Computer Vision–ECCV 2020: 16th European Confer-
 474 ence, Glasgow, UK, August 23–28, 2020, Proceedings, Part x 16*, 580–99. Springer.
- 475 Venkatasubramanian, Suresh, and Mark Alfano. 2020. “The Philosophical Basis of Algorithmic Recourse.” In *Pro-
 476 ceedings of the 2020 Conference on Fairness, Accountability, and Transparency*, 284–93. FAT* ’20. New York,
 477 NY, USA: Association for Computing Machinery. <https://doi.org/10.1145/3351095.3372876>.
- 478 Wachter, Sandra, Brent Mittelstadt, and Chris Russell. 2017. “Counterfactual Explanations Without Opening the Black
 479 Box: Automated Decisions and the GDPR.” *Harv. JL & Tech.* 31: 841. <https://doi.org/10.2139/ssrn.3063289>.
- 480 Wilson, Andrew Gordon. 2020. “The Case for Bayesian Deep Learning.” <https://arxiv.org/abs/2001.10995>.
- 481 Wu, Tongshuang, Marco Tulio Ribeiro, Jeffrey Heer, and Daniel Weld. 2021. “Polyjuice: Generating Counterfactuals
 482 for Explaining, Evaluating, and Improving Models.” In *Proceedings of the 59th Annual Meeting of the Associa-
 483 tion for Computational Linguistics and the 11th International Joint Conference on Natural Language Processing
 484 (Volume 1: Long Papers)*, edited by Chengqing Zong, Fei Xia, Wenjie Li, and Roberto Navigli, 6707–23. Online:
 485 Association for Computational Linguistics. <https://doi.org/10.18653/v1/2021.acl-long.523>.
- 486 Zhang, Chiyuan, Samy Bengio, Moritz Hardt, Benjamin Recht, and Oriol Vinyals. 2021. “Understanding Deep
 487 Learning (Still) Requires Rethinking Generalization.” *Commun. ACM* 64 (3): 107–15. <https://doi.org/10.1145/3446776>.
- 488 Zhao, Xuan, Klaus Broelemann, and Gjergji Kasneci. 2023. “Counterfactual Explanation for Regression via Disentan-
 489 glement in Latent Space.” In *2023 IEEE International Conference on Data Mining Workshops (ICDMW)*, 976–84.
 490 Los Alamitos, CA, USA: IEEE Computer Society. <https://doi.org/10.1109/ICDMW60847.2023.00130>.