

Guidelines for Responsible and Human-Centered Use of Explainable Machine Learning

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Introduction

Explainable machine learning (ML) enables human learning from ML, human appeal of automated model decisions, regulatory compliance, and white-hat hacking and forensic analysis of ML models.^{1,2} XAI techniques have been implemented in numerous open source and commercial packages and XAI is also an important, mandatory, or embedded aspect of commercial predictive modeling in industries like financial services.^{3,4,5} However, like many technologies, XAI can be misused, particularly as a faulty safeguard for harmful black-boxes and for other malevolent purposes like model stealing and *fairwashing* [1], [29], [32]. This text outlines five guidelines for the responsible and human-centered usage of XAI to help practitioners avoid any unintentional misuse or identify any intentional abuse. In formulating the guidelines, this text also builds the seemingly natural case for a holistic approach to ML that includes interpretable (i.e. *white-box*) models along with explanatory, debugging, and disparate impact analysis techniques for any machine learning system that impacts humans.

Background: Definitions and Examples for Explainable ML

To avoid ambiguity, several definitions and accompanying examples are put forward before discussing the guidelines. Helpful definitions that apply to explainable ML that have been put forward include:

- **Interpretable:** “The ability to explain or to present in understandable terms to a human” – in “Towards a Rigorous Science of Interpretable Machine Learning” by Doshi-Velez and Kim (2017) [7].
- **A Good Explanation:** “When you can no longer keep asking why” – in “Explaining Explanations: An Approach to Evaluating Interpretability of Machine Learning” by Gilpin et al. (2018) [12]. (Gilpin et al. also provide several clear constructs for describing more specific types of explanations.)

While the explainable ML field is far from embracing a clear and accepted taxonomy of concepts or an exhaustive and precise vocabulary, these two thoughtful definitions appear to link explanations to some

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¹In the U.S., explanations and the model documentation they enable may be required under the Civil Rights Acts of 1964 and 1991, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, the Health Insurance Portability and Accountability Act, the Equal Credit Opportunity Act, the Fair Credit Reporting Act, the Fair Housing Act, Federal Reserve SR 11-7, and the European Union (EU) General Data Privacy Regulation (GDPR) Article 22 [36].

²For security applications, see for instance: <https://www.oreilly.com/ideas/proposals-for-model-vulnerability-and-security>

³Like H2O-3, XGBoost, and various other Python and R packages. See: <https://github.com/jphall663/awesome-machine-learning-interpretability> for a longer, curated list of relevant open source software packages.

⁴For instance Datarobot, H2O Driverless AI, SAS Visual Data Mining and Machine Learning, Zest AutoML, and likely several others.

⁵Working paper: “SR 11-7, Validation and Machine Learning Models”, Tony Yang, CFA, CPA, FRM. KPMG USA.

ML process being interpretable. Moreover, many authors have made significant attempts to grapple with a variety of general concepts related to interpretability and explanations, including “A Survey Of Methods For Explaining Black Box Models” by Guidotti et al. (2018), Zachary Lipton’s “The Mythos of Model Interpretability” (2016), Christoph Molnar’s *Interpretable Machine Learning* (2018), and Adrian Weller’s “Challenges for Transparency” (2017) [16], [23], [26], [35]. Please don’t add unnecessary new terms or concepts into ethos of this discipline without reading these and other reviews first.

Here *explainable ML* means mostly post-hoc techniques used to understand trained model mechanisms or predictions. Examples of common explainable ML techniques include:

- Local and global feature importance methods, in particular Shapley values [20], [25], [30], [31].
- Local and global model-agnostic surrogate models, such as surrogate decision trees and Local Interpretable Model-agnostic Explanations (LIME) [4], [5], [6], [19], [28].
- Local and global visualizations of model predictions such as accumulated local effect (ALE) plots, 1- and 2-dimensional partial dependence plots, and individual conditional expectation (ICE) plots [3], [11], [13].

In this text *model debugging* refers to testing ML models to increase trust in model mechanisms and predictions. Examples of model debugging techniques include variants of sensitivity (i.e. “what-if?”), residual analysis, assertions, and units test used to verify the accuracy or security of ML models.⁶ Model debugging should also include remediating any discovered errors or vulnerabilities. Herein *fairness* techniques refer to disparate impact analysis, model selection by minimization of disparate impact, and remediation techniques such as disparate impact removal preprocessing or equalized odds post-processing [8], [18].⁷ In this text *interpretable* or *white-box* models will include linear models, decision trees, constrained or Bayesian variants of traditional black-box ML models, or novel types of models designed to be directly interpretable. (Additional examples of interpretable modeling techniques include explainable neural networks (XNNs), monotonically constrained gradient boosting machines (GBMs)⁸, scalable Bayesian rule lists, or super-sparse linear integer models (SLIMs), [33], [34], [37].⁹)

While interpretability is difficult to quantify, credible research efforts into scientific measures of interpretability are underway [10], [27]. Furthermore, the ability to measure degrees of interpretability implies it’s not a binary, on-off quantity.¹⁰ Herein unconstrained, traditional black-box ML models, such as multilayer perceptron (MLP) neural networks and GBMs, are said to be directly uninterpretable, potentially unsafe for use on humans, but not necessarily completely unexplainable.

1 Guideline: Do Not Use Explanations to Establish Trust in ML.

While they are likely necessary for trust in many cases, explanations are certainly not sufficient for trust in all cases. Explanation, as a general concept, is related more directly to understanding and transparency than to trust.¹¹ Simply put, one can understand and explain a model without trusting it. One can also trust a model and not be able to understand or explain it. Consider the following example scenarios.

- **Explanation and understanding without trust:** In Figure 1, global Shapley explanations and residual analysis identify a pathology in an unconstrained GBM model, g_{GBM} , trained on the UCI credit card dataset [21].¹² g_{GBM} over emphasizes the input feature PAY_0, or a customer’s most recent

⁶And other similar techniques, say those mentioned here: <https://debug-ml-iclr2019.github.io/>.

⁷And other similar techniques, say those mentioned here: <http://www.fatml.org/resources/relevant-scholarship>.

⁸As implemented in XGBoost (<https://xgboost.readthedocs.io/en/latest/tutorials/monotonic.html>) or H2O-3 (https://github.com/h2oai/h2o-3/blob/master/h2o-py/demos/H2O_tutorial_gbm_monotonicity.ipynb).

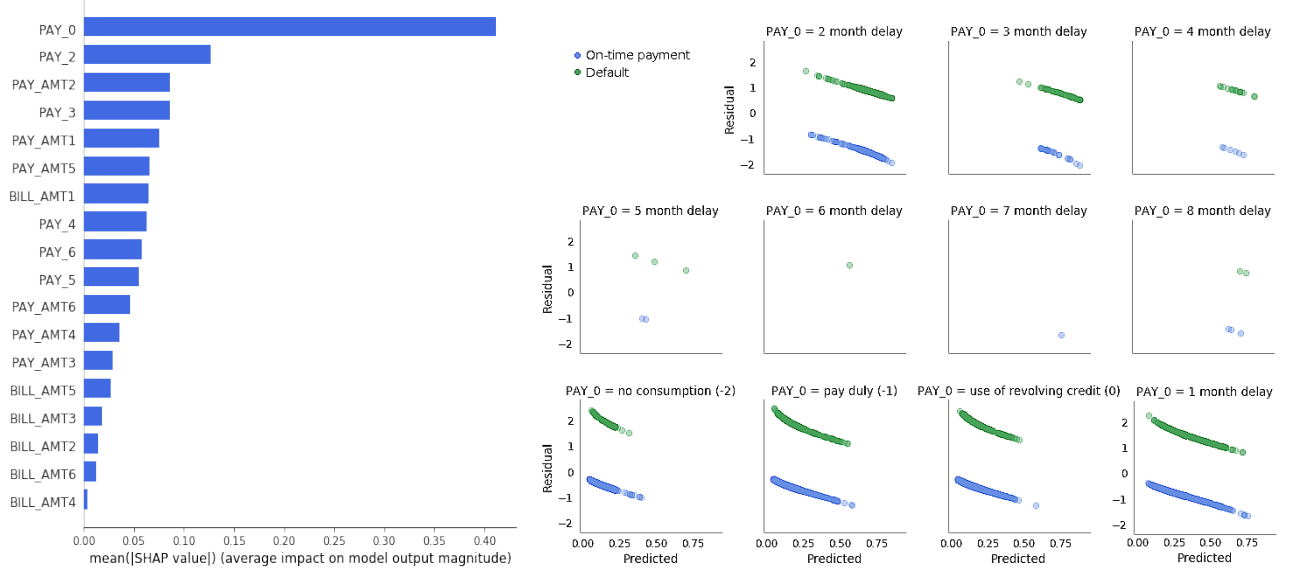
⁹And other similar techniques, say those mentioned here: <https://users.cs.duke.edu/~cynthia/papers.html>.

¹⁰For instance, see Figure 3 in “Quantifying Interpretability of Arbitrary Machine Learning Models Through Functional Decomposition” [27].

¹¹The Merriam-Webster definition of *explain*, accessed May 8th 2019, does not mention *trust*: <https://www.merriam-webster.com/dictionary/explain>.

¹²Code to replicate Figure 1 is available here: https://github.com/jphall663/xai_misconceptions.

repayment status. Due to over-emphasis of PAY_0 , g_{GBM} is often unable to predict on-time payment if recent payments are delayed ($PAY_0 > 1.5$), causing large negative residuals. g_{GBM} is also often unable to predict default if recent payments are made on-time ($PAY_0 \leq 1.5$), causing large positive residuals. In this example scenario, g_{GBM} is explainable, but not trustworthy.



(a) Consistent global Shapley feature importance values for g_{GBM} .

(b) g_{GBM} deviance residuals and predictions by PAY_0 .

Figure 1: An unconstrained GBM probability of default model, g_{GBM} , over-emphasizes the importance of the input feature PAY_0 , a customer’s most recent repayment status. g_{GBM} produces large positive residuals when PAY_0 indicates on-time payments ($PAY_0 \leq 1$) and large negative residuals when PAY_0 indicates late payments ($PAY_0 > 1$). g_{GBM} is explainable, but probably not trustworthy.

- **Trust without explanation and understanding:** Years before reliable explanation techniques were widely acknowledged and available, black-box predictive models, such as autoencoder and MLP neural networks, were used for fraud detection in the financial services industry [14]. When these models performed well, they were trusted.¹³ However, they were not explainable or well-understood by contemporary standards.

If trust in models is your goal, then explanations alone are not sufficient. However, as discussed in Section 5 and illustrated in Figure 4, in an ideal scenario, explanation techniques would be used with a wide variety of other methods to increase accuracy, fairness, interpretability, privacy, security, and trust in ML models.

2 Guideline: Always Use Transparent ML Mechanisms for Systems That Affect Humans.

Explainable ML tools like surrogate models, partial dependence plots, and global feature importance are already used to document, understand, and validate different types of models in the financial services industry [19], [34].¹⁴ Furthermore, adverse action notices are mandated under the Equal Credit Opportunity Act (ECOA) and the Fair Credit Reporting Act (FCRA) for many credit lending, employment, and insurance

¹³For example: https://www.sas.com/en_ph/customers/hsbc.html, <https://www.kdnuggets.com/2011/03/sas-patent-fraud-detection.html>.

¹⁴Working paper: “SR 11-7, Validation and Machine Learning Models, Tony Yang, CFA, CPA, FRM. KPMG USA.

decisions in the United States.¹⁵ If machine learning is used for such decisions it must be explained in terms of adverse action notices.¹⁶ Shapley values, and other local feature importance approaches, provide a convenient methodology to rank the direct contribution of input features to final model decisions and potentially generate customer-specific adverse action notices. In a number of other application domains, broader interpretability is also legal necessity. Explanation, along with white-box models, model debugging, disparate impact analysis, and the documentation they enable, can also be required under the Civil Rights Acts of 1964 and 1991, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, the Health Insurance Portability and Accountability Act, the Fair Housing Act, Federal Reserve SR 11-7, the European Union (EU) Greater Data Privacy Regulation (GDPR) Article 22, and other regulatory statutes [36].

Aside from regulatory mandates, explanation enables logical appeal processes for automated decisions made by ML models. Consider being negatively impacted by an erroneous black-box model decision, say for instance being mistakenly denied a loan or parole. How would you argue your case for appeal without knowing how model decisions were made? According the New York Times, a man named Glenn Rodríguez found himself in this unfortunate position in Upstate New York in 2016.¹⁷

Some may argue that, outside of regulated dealings, for a model with little or no impact on humans and that has been thoroughly and responsibly tested by knowledgeable practitioners, that explanation is *really* unnecessary. While that statement appears technically true, the counter argument in this case centers on human learning from ML models. Explanatory techniques allow us to gain insights from complex models about nonlinear phenomena and complex interactions – information that may sometimes be unlearnable by linear models. Why go through the weeks, months, or years of training and deploying a production ML system, and not take a small percentage of that time to learn about the model’s findings?

3 Guideline: Use Direct XAI Techniques in Addition to Surrogate Models Whenever Possible.

Models of models, or surrogate models, can be helpful explanatory tools, but they are usually approximate, low-fidelity explainers. Aside from 1.) a global summary of a complex model provided by a surrogate model can be helpful sometimes and 2.) much work in explainable ML has been directed toward improving the fidelity and usefulness of surrogate models [4], [5], [6], [19], [34], **many explainable ML techniques have nothing to do with surrogate models!** One of the most exciting breakthroughs for supervised learning problems in explainable ML is the application of a coalitional game theory concept, Shapley values, to compute feature contributions which are consistent globally and accurate locally using the trained model itself [25], [31]. An extension of this idea, called tree SHAP, has already been implemented for popular tree ensemble methods [24].

There are many other explainable ML methods that operate on trained models directly such as partial dependence, ALE, and ICE plots [3], [11], [13]. Surrogate models and explanatory techniques that operate directly on trained models can also be combined, for instance by using partial dependence, ICE, and surrogate decision trees to investigate and confirm modeled interactions [17]. In Figure 2, an unconstrained GBM, g_{GBM} , models a known signal generating function f :

$$f(\mathbf{X}) = \begin{cases} 1 & \text{if } X_{\text{num1}} * X_{\text{num4}} + |X_{\text{num8}}| * X_{\text{num9}}^2 + e \geq 0.42 \\ 0 & \text{if } X_{\text{num1}} * X_{\text{num4}} + |X_{\text{num8}}| * X_{\text{num9}}^2 + e < 0.42 \end{cases} \quad (1)$$

¹⁵See: <https://consumercomplianceoutlook.org/2013/second-quarter/adverse-action-notice-requirements-under-ecoa-fcra/>.

¹⁶This is apparently *already* happening: <https://www.prnewswire.com/news-releases/new-patent-pending-technology-from-equifax-enables-configurable-ai-models-300701153.html>.

¹⁷This too is happening *today*: <https://www.nytimes.com/2017/06/13/opinion/how-computers-are-harming-criminal-justice.html>.

Table 1: Coefficients for a local linear interpretable model, h_{GLM} , with an intercept of 0.77 and an R^2 of 0.73. h_{GLM} is trained on a segment of the UCI credit card dataset containing higher-risk customers with late most recent repayment statuses, $\mathbf{X}_{\text{PAY_0}>1.5}$, and the predictions of simple decision tree, $g_{\text{tree}}(\mathbf{X}_{\text{PAY_0}>1.5})$.

h_{GLM} Feature	h_{GLM} Coefficient
PAY_0 == 4	0.0009
PAY_2 == 3	0.0065
PAY_5 == 2	-0.0006
PAY_6 == 2	0.0036
BILL_AMT1	3.4339e-08
PAY_AMT1	4.8062e-07
PAY_AMT3	3.4338e-08

4 Guideline: Understand How XAI Can Be Used for Nefarious Purposes.

If used disingenuously, explainable ML methods can provide cover for misused or intentionally abusive black-boxes [1]. But explainable ML methods were designed specifically to crack open those same nefarious and complex black-boxes. See Angwin et al. (2016) for evidence that hacking or stealing of commercial black-box models for oversight purposes is possible [2].²⁰ Such investigations would likely only be improved by advances in explanatory and fairness tools. Additionally, many important computer-based technological advances present similar double-edged sword dilemmas, e.g. social media or strong encryption. Rarely does the ability of a tool to be misused for malicious purposes disqualify it from being used as designed. Given that explainable ML techniques have already been released in popular open source software, it seems there is a need for agreed-upon best practices and education on responsible use.

5 Guideline: Use XAI Techniques Along with Interpretable Models for Systems That Affect Humans.

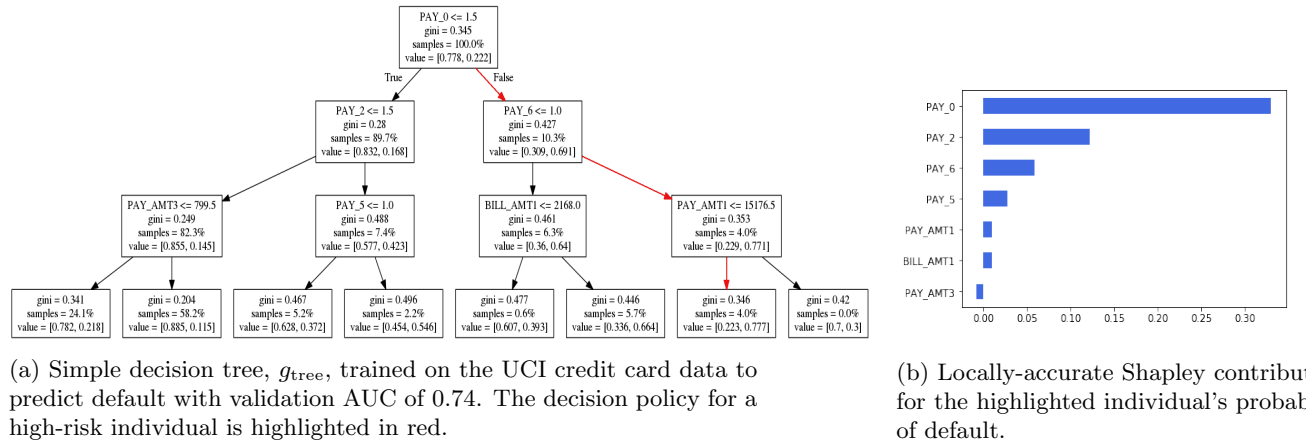


Figure 3

A few well-known publications have focused either on white-box modeling techniques (e.g. [33], [37]) or on post-hoc explanations (e.g. [25], [28]), but the two can be used together in the context of a broader and

²⁰This text makes no claim on the quality of the analysis in Angwin et al. (2016), which has been criticized [9]. This now infamous analysis is presented only as evidence that motivated activists can hack or steal commercial black-boxes.

more human-centered machine learning workflow as illustrated in Figure 4. Consider the seemingly useful example case of augmenting globally interpretable models with local post-hoc explanations. A practitioner could train a single decision tree, a globally interpretable model, then apply local explanations in the form of Shapley feature importance as illustrated in Figure 3.²¹ This enables the practitioner to see accurate numeric feature contributions for each model prediction in addition to the entire directed graph of the decision tree. Even for interpretable models, such as linear models and decision trees, it has been shown that Shapley values present accuracy and consistency advantages over standard feature attribution methods [22], [24], [25]. In Figure 3, a simple decision tree, g_{tree} , is trained on the UCI credit card data set to predict probability of default. g_{tree} has a validation AUC of 0.74. The decision-policy for a high-risk customer is highlighted in 3a and the locally-accurate Shapley contributions for this same individual’s predicted probability are displayed in 3b. The Shapley values are helpful because they highlight the local importance of `PAY_2`, the individual’s second most recent repayment status, which could be underestimated by examining the decision policy alone. The Shapley values also enable the ranking of input features for each model decision, which is likely helpful for FCRA and ECOA compliance. Another twist on the idea of combining explainable AI methods and white-box models is described in “Surrogate Assisted Feature Extraction for Machine Learning (SAFE ML)” [15]. In the SAFE ML approach, features learned by more complex models are extracted and used in an explainable fashion to increase the accuracy of more interpretable models. Aren’t either of these augmented processes more desirable than either a white-box model or post-hoc explanations alone?

Guideline Corollary: Use Explainable ML Methods with Disparate Impact Analysis. Like white-box models, fairness methods (e.g. [8], [18]) are often presented in different articles than post-hoc explanatory methods. However, in banks, using post-hoc explanatory tools such as partial dependence plots to comply with model documentation guidance often goes hand-in-hand with using disparate impact analysis to comply with fair lending regulations.^{22,23,24}

Table 2: Basic group disparity metrics across different marital statuses for monotonically constrained GBM model, g_{mono} , trained on the UCI credit card dataset.

	Adverse Impact Disparity	Accuracy Disparity	TPR Disparity	TNR Disparity	FPR Disparity	FNR Disparity
<code>married</code>	1.00	1.00	1.00	1.00	1.00	1.00
<code>single</code>	0.89	1.03	0.99	1.03	0.85	1.01
<code>divorced</code>	1.01	0.93	0.81	0.96	1.25	1.22
<code>other</code>	0.26	1.12	0.62	1.17	0	1.44

Table 2 displays basic group parity metrics for a monotonically constrained GBM model, g_{mono} , trained on the UCI credit card data.²⁵ In this example scenario, g_{mono} displays group parity according to the four-fifths rule with `married` as the reference level for single customers, but exposes potential disparate impact for `divorced` customers and customers with marital status of `other` (for which there is very little training data).

Conclusion

Machine learning systems are used today to make life-altering decisions about employment, bail, parole, and lending.²⁶ The scope of decisions delegated to machine learning systems seems likely only to expand in the future. Many researchers and practitioners are tackling disparate impact, inaccuracy, privacy violations, and security vulnerabilities with a number of brilliant, but perhaps siloed, approaches. By addressing some common explainable ML misconceptions, this short text also gives examples of combining innovations

²¹Code to replicate Figure 3 is available here: https://github.com/jphall663/xai_misconceptions.

²²Working paper: SR 11-7, Validation and Machine Learning Models. Tony Yang, CFA, CPA, FRM. KPMG USA.

²³White paper: <https://www.aba.com/Compliance/Documents/FairLendingWhitePaper2017Apr.pdf>

²⁴Policy Statement on Discrimination in Lending: <https://www.govinfo.gov/content/pkg/FR-1994-04-15/html/94-9214.htm>

²⁵Code to replicate Table 2 is available here: https://github.com/jphall663/xai_misconceptions.

²⁶ICLR 2019 model debugging workshop CFP: <https://debug-ml-iclr2019.github.io/>

from several sub-disciplines of machine learning research to train explainable, fair, and trustable predictive modeling systems. As proposed in Figure 4, using these techniques together can create a new and more human-centered type of machine learning potentially suitable for use in business- and life-critical decision support.

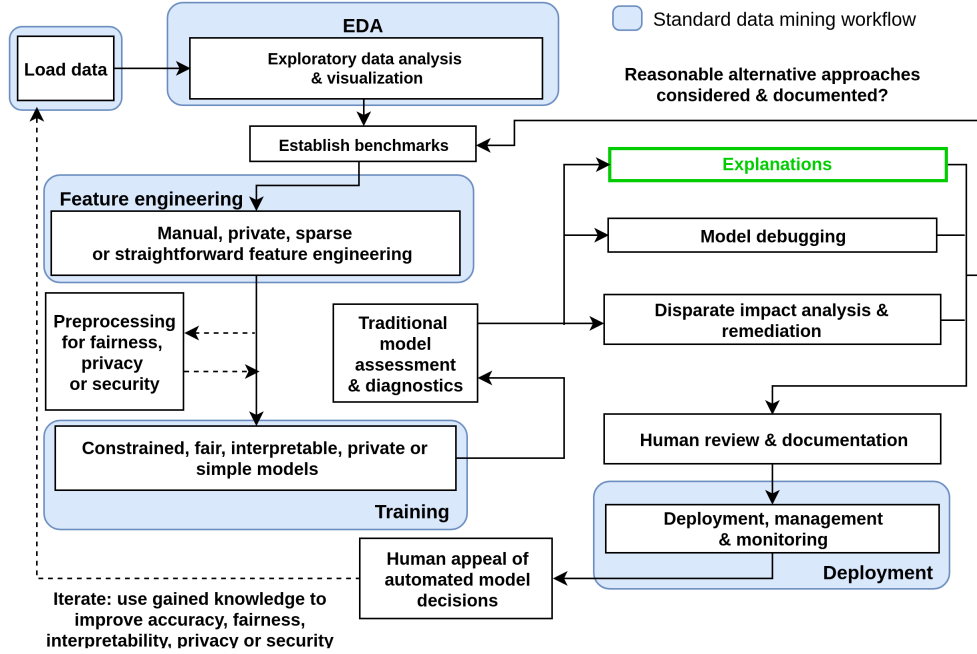


Figure 4: A diagram of a proposed human-centered machine learning workflow in which explanations (highlighted in green) are used along with interpretable models, disparate impact analysis and remediation techniques, and other review and appeal mechanisms to create a fair, accountable, and transparent ML system.

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