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# Conformal Counterfactual Explanations

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## Abstract

We propose Conformal Counterfactual Explanations: an effortless and rigorous way to produce plausible and conformal Counterfactual Explanations for Black Box Models using Conformal Prediction. To address the need for plausible explanations, existing work has primarily relied on surrogate models to learn the data-generating process. This effectively reallocates the task of learning realistic representations of the data from the model itself to the surrogate. Consequently, the generated explanations may look plausible to humans but not necessarily conform with the behaviour of the Black Box Model. We formalise this notion through the introduction of new evaluation measures. In order to still address the need for plausibility, we build on a recent approach that works by minimizing predictive model uncertainty. Using differentiable Conformal Prediction, we relax the previous assumption that the Black Box Model can produce predictive uncertainty estimates.

## 1 Introduction

Counterfactual Explanations are a powerful, flexible and intuitive way to not only explain Black Box Models but also enable affected individuals to challenge them through the means of Algorithmic Recourse. Instead of opening the black box, Counterfactual Explanations work under the premise of strategically perturbing model inputs to understand model behaviour (Wachter et al., 2017). Intuitively speaking, we generate explanations in this context by asking simple what-if questions of the following nature: ‘Our credit risk model currently predicts that this individual’s credit profile is too risky to offer them a loan. What if they reduced their monthly expenditures by 10%? Will our model then predict that the individual is credit-worthy?’

This is typically implemented by defining a target outcome  $t \in \mathcal{Y}$  for some individual  $x \in \mathcal{X}$ , for which the model  $M : \mathcal{X} \mapsto \mathcal{Y}$  initially predicts a different outcome:  $M(x) \neq t$ . Counterfactuals are then searched by minimizing a loss function that compares the predicted model output to the target outcome:  $\text{yloss}(M(x), t)$ . Since Counterfactual Explanations (CE) work directly with the Black Box Model, they always have full local fidelity by construction. Fidelity is defined as the degree to which explanations approximate the predictions of the Black Box Model. This arguably one of the most important evaluation metrics for model explanations, since any explanation that explains a prediction not actually made by the model is useless (Molnar, 2020).

In situations where full fidelity is a requirement, CE therefore offers a more appropriate solution to Explainable Artificial Intelligence (XAI) than other popular approaches like LIME (Ribeiro et al., 2016) and SHAP (Lundberg and Lee, 2017), which involve local surrogate models. But even full fidelity is not a sufficient condition for ensuring that an explanation adequately describes the behaviour

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\*Use footnote for providing further information about author (webpage, alternative address)—*not* for acknowledging funding agencies.



Figure 1: Sample figure caption.

of a model. That is because two very distinct explanations can both lead to the same model prediction, especially when dealing with heavily parameterized models:

[...] deep neural networks are typically very underspecified by the available data, and [...] parameters [therefore] correspond to a diverse variety of compelling explanations for the data. — Wilson (2020)

When people talk about Black Box Models, this is usually the type of model they have in mind.

In the context of CE, the idea that no two explanations are the same arises almost naturally. Even the baseline approach proposed by Wachter et al. (2017) can yield a diverse set of explanations if counterfactuals are initialised randomly. This multiplicity of explanations has not only been acknowledged in the literature but positively embraced: since individuals seeking Algorithmic Recourse (AR) have unique preferences, Mothilal et al. (2020), for example, have prescribed *diversity* as an explicit goal for counterfactuals. More generally, the literature on CE and AR has brought forward a myriad of desiderata for explanations, which we will discuss in more detail in the following section.

## 2 Adversarial Example or Valid Explanation?

Most state-of-the-art approaches to generating Counterfactual Explanations (CE) rely on gradient descent to optimize different flavours of the same counterfactual search objective,

$$s' = \arg \min_{s' \in S} \{y_{\text{loss}}(M(f(s')), y^*) + \lambda \text{cost}(f(s'))\} \quad (1)$$

where  $y_{\text{loss}}$  denotes the primary loss function already introduced above and  $\text{cost}$  is either a single penalty or a collection of penalties that are used to impose constraints through regularization. Following the convention in Altmeyer et al. (2023) we use  $s' = \{s_k\}_K$  to denote the vector  $K$ -dimensional array of counterfactual states. This is to explicitly account for the fact that we can generate multiple counterfactuals, as with DiCE (Mothilal et al., 2020), and may choose to traverse a latent representation  $\mathcal{Z}$  of the feature space  $\mathcal{X}$ , as we will discuss further below.

Solutions to Equation 1 are considered valid as soon as the predicted label matches the target label. A stripped-down counterfactual explanation is therefore little different from an adversarial example. In, for example, generic counterfactual search as in Wachter et al. (2017) has been applied to MNIST data.

To properly serve both AI practitioners and individuals affected by AI decision-making systems, Counterfactual Explanations should have certain desirable properties, sometimes referred to as *desiderata*. Besides diversity, which we already introduced above, some of the most prominent desiderata include sparsity, proximity (Wachter et al., 2017), actionability (Ustun et al., 2019), plausibility (Joshi et al., 2019; Poyiadzi et al., 2020; Schut et al., 2021), robustness (Upadhyay et al., 2021; Pawelczyk et al., 2022; Altmeyer et al., 2023) and causality (Karimi et al., 2021). Researchers have come up with various ways to meet these desiderata, which have been surveyed in (Verma et al., 2020) and (Karimi et al., 2020).

## References

References follow the acknowledgments. Use unnumbered first-level heading for the references. Any choice of citation style is acceptable as long as you are consistent. It is permissible to reduce the font size to small (9 point) when listing the references. Note that the Reference section does not count towards the page limit.

## References

- Patrick Altmeyer, Giovan Angela, Aleksander Buszydlík, Karol Dobiczek, Arie van Deursen, and Cynthia Liem. Endogenous Macrodynamics in Algorithmic Recourse. In *First IEEE Conference on Secure and Trustworthy Machine Learning*, 2023.
- Shalmali Joshi, Oluwasanmi Koyejo, Warut Vijitbenjaronk, Been Kim, and Joydeep Ghosh. Towards realistic individual recourse and actionable explanations in black-box decision making systems. 2019.
- Amir-Hossein Karimi, Gilles Barthe, Bernhard Schölkopf, and Isabel Valera. A survey of algorithmic recourse: Definitions, formulations, solutions, and prospects. 2020.
- Amir-Hossein Karimi, Bernhard Schölkopf, and Isabel Valera. Algorithmic recourse: From counterfactual explanations to interventions. In *Proceedings of the 2021 ACM Conference on Fairness, Accountability, and Transparency*, pages 353–362, 2021.
- Scott M Lundberg and Su-In Lee. A unified approach to interpreting model predictions. In *Proceedings of the 31st International Conference on Neural Information Processing Systems*, pages 4768–4777, 2017.
- Christoph Molnar. *Interpretable Machine Learning*. Lulu. com, 2020.
- Ramaravind K Mothilal, Amit Sharma, and Chenhao Tan. Explaining machine learning classifiers through diverse counterfactual explanations. In *Proceedings of the 2020 Conference on Fairness, Accountability, and Transparency*, pages 607–617, 2020.
- Martin Pawelczyk, Teresa Datta, Johannes van-den Heuvel, Gjergji Kasneci, and Himabindu Lakkaraju. Probabilistically Robust Recourse: Navigating the Trade-offs between Costs and Robustness in Algorithmic Recourse. *arXiv preprint arXiv:2203.06768*, 2022.
- Rafael Poyiadzi, Kacper Sokol, Raul Santos-Rodriguez, Tijl De Bie, and Peter Flach. FACE: Feasible and actionable counterfactual explanations. In *Proceedings of the AAAI/ACM Conference on AI, Ethics, and Society*, pages 344–350, 2020.
- Marco Tulio Ribeiro, Sameer Singh, and Carlos Guestrin. "Why should i trust you?" Explaining the predictions of any classifier. In *Proceedings of the 22nd ACM SIGKDD International Conference on Knowledge Discovery and Data Mining*, pages 1135–1144, 2016.
- Lisa Schut, Oscar Key, Rory Mc Grath, Luca Costabello, Bogdan Sacaleanu, Yarin Gal, et al. Generating Interpretable Counterfactual Explanations By Implicit Minimisation of Epistemic and Aleatoric Uncertainties. In *International Conference on Artificial Intelligence and Statistics*, pages 1756–1764. PMLR, 2021.
- Sohini Upadhyay, Shalmali Joshi, and Himabindu Lakkaraju. Towards Robust and Reliable Algorithmic Recourse. 2021.
- Berk Ustun, Alexander Spangher, and Yang Liu. Actionable recourse in linear classification. In *Proceedings of the Conference on Fairness, Accountability, and Transparency*, pages 10–19, 2019.
- Sahil Verma, John Dickerson, and Keegan Hines. Counterfactual explanations for machine learning: A review. 2020.
- Sandra Wachter, Brent Mittelstadt, and Chris Russell. Counterfactual explanations without opening the black box: Automated decisions and the GDPR. *Harv. JL & Tech.*, 31:841, 2017.
- Andrew Gordon Wilson. The case for Bayesian deep learning. 2020.

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Papers to be submitted to NeurIPS 2022 must be prepared according to the instructions presented here. Papers may only be up to **nine** pages long, including figures. Additional pages *containing only acknowledgments and references* are allowed. Papers that exceed the page limit will not be reviewed, or in any other way considered for presentation at the conference.

The margins in 2022 are the same as those in 2007, which allow for  $\sim 15\%$  more words in the paper compared to earlier years.

Authors are required to use the NeurIPS L<sup>A</sup>T<sub>E</sub>X style files obtainable at the NeurIPS website as indicated below. Please make sure you use the current files and not previous versions. Tweaking the style files may be grounds for rejection.

#### 3.2 Retrieval of style files

The style files for NeurIPS and other conference information are available on the World Wide Web at

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The file `neurips_2022.pdf` contains these instructions and illustrates the various formatting requirements your NeurIPS paper must satisfy.

The only supported style file for NeurIPS 2022 is `neurips_2022.sty`, rewritten for L<sup>A</sup>T<sub>E</sub>X 2<sub>ε</sub>. **Previous style files for L<sup>A</sup>T<sub>E</sub>X 2.09, Microsoft Word, and RTF are no longer supported!**

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### 4 General formatting instructions

The text must be confined within a rectangle 5.5 inches (33 picas) wide and 9 inches (54 picas) long. The left margin is 1.5 inch (9 picas). Use 10 point type with a vertical spacing (leading) of 11 points. Times New Roman is the preferred typeface throughout, and will be selected for you by default. Paragraphs are separated by 1/2 line space (5.5 points), with no indentation.

The paper title should be 17 point, initial caps/lower case, bold, centered between two horizontal rules. The top rule should be 4 points thick and the bottom rule should be 1 point thick. Allow 1/4 inch space above and below the title to rules. All pages should start at 1 inch (6 picas) from the top of the page.

For the final version, authors' names are set in boldface, and each name is centered above the corresponding address. The lead author's name is to be listed first (left-most), and the co-authors' names (if different address) are set to follow. If there is only one co-author, list both author and co-author side by side.

Please pay special attention to the instructions in Section 6 regarding figures, tables, acknowledgments, and references.

## 5 Headings: first level

All headings should be lower case (except for first word and proper nouns), flush left, and bold.

First-level headings should be in 12-point type.

### 5.1 Headings: second level

Second-level headings should be in 10-point type.

#### 5.1.1 Headings: third level

Third-level headings should be in 10-point type.

**Paragraphs** There is also a `\paragraph` command available, which sets the heading in bold, flush left, and inline with the text, with the heading followed by 1 em of space.

## 6 Citations, figures, tables, references

These instructions apply to everyone.

### 6.1 Citations within the text

The `natbib` package will be loaded for you by default. Citations may be author/year or numeric, as long as you maintain internal consistency. As to the format of the references themselves, any style is acceptable as long as it is used consistently.

The documentation for `natbib` may be found at

<http://mirrors.ctan.org/macros/latex/contrib/natbib/natnotes.pdf>

Of note is the command `\citet`, which produces citations appropriate for use in inline text. For example,

```
\citet{hasselmo} investigated\dots
```

produces

Hasselmo, et al. (1995) investigated...

If you wish to load the `natbib` package with options, you may add the following before loading the `neurips_2022` package:

```
\PassOptionsToPackage{options}{natbib}
```

If `natbib` clashes with another package you load, you can add the optional argument `nonatbib` when loading the style file:

```
\usepackage[nonatbib]{neurips_2022}
```

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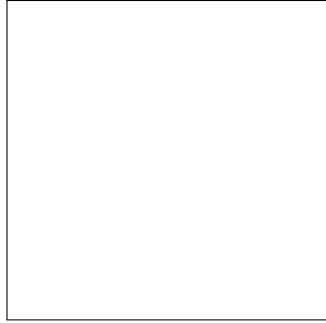


Figure 2: Sample figure caption.

Table 1: Sample table title

Part		
Name	Description	Size ( $\mu\text{m}$ )
Dendrite	Input terminal	$\sim 100$
Axon	Output terminal	$\sim 10$
Soma	Cell body	up to $10^6$

## 6.2 Footnotes

Footnotes should be used sparingly. If you do require a footnote, indicate footnotes with a number<sup>2</sup> in the text. Place the footnotes at the bottom of the page on which they appear. Precede the footnote with a horizontal rule of 2 inches (12 picas).

Note that footnotes are properly typeset *after* punctuation marks.<sup>3</sup>

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All artwork must be neat, clean, and legible. Lines should be dark enough for purposes of reproduction. The figure number and caption always appear after the figure. Place one line space before the figure caption and one line space after the figure. The figure caption should be lower case (except for first word and proper nouns); figures are numbered consecutively.

You may use color figures. However, it is best for the figure captions and the paper body to be legible if the paper is printed in either black/white or in color.

## 6.4 Tables

All tables must be centered, neat, clean and legible. The table number and title always appear before the table. See Table 1.

Place one line space before the table title, one line space after the table title, and one line space after the table. The table title must be lower case (except for first word and proper nouns); tables are numbered consecutively.

Note that publication-quality tables *do not contain vertical rules*. We strongly suggest the use of the booktabs package, which allows for typesetting high-quality, professional tables:

<https://www.ctan.org/pkg/booktabs>

This package was used to typeset Table 1.

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<sup>2</sup>Sample of the first footnote.

<sup>3</sup>As in this example.

## 7 Final instructions

Do not change any aspects of the formatting parameters in the style files. In particular, do not modify the width or length of the rectangle the text should fit into, and do not change font sizes (except perhaps in the **References** section; see below). Please note that pages should be numbered.

## 8 Preparing PDF files

Please prepare submission files with paper size “US Letter,” and not, for example, “A4.”

Fonts were the main cause of problems in the past years. Your PDF file must only contain Type 1 or Embedded TrueType fonts. Here are a few instructions to achieve this.

- You should directly generate PDF files using `pdflatex`.
- You can check which fonts a PDF file uses. In Acrobat Reader, select the menu Files>Document Properties>Fonts and select Show All Fonts. You can also use the program `pdffonts` which comes with `xpdf` and is available out-of-the-box on most Linux machines.
- The IEEE has recommendations for generating PDF files whose fonts are also acceptable for NeurIPS. Please see <http://www.emfield.org/icuwb2010/downloads/IEEE-PDF-SpecV32.pdf>
- `xfig` “patterned” shapes are implemented with bitmap fonts. Use “solid” shapes instead.
- The `\bbold` package almost always uses bitmap fonts. You should use the equivalent AMS Fonts:

```
\usepackage{amsfonts}
```

followed by, e.g., `\mathbb{R}`, `\mathbb{N}`, or `\mathbb{C}` for  $\mathbb{R}$ ,  $\mathbb{N}$  or  $\mathbb{C}$ . You can also use the following workaround for reals, natural and complex:

```
\newcommand{\RR}{\mathbb{R}} %real numbers
\newcommand{\Nat}{\mathbb{N}} %natural numbers
\newcommand{\CC}{\mathbb{C}} %complex numbers
```

Note that `amsfonts` is automatically loaded by the `amssymb` package.

If your file contains type 3 fonts or non embedded TrueType fonts, we will ask you to fix it.

### 8.1 Margins in L<sup>A</sup>T<sub>E</sub>X

Most of the margin problems come from figures positioned by hand using `\special` or other commands. We suggest using the command `\includegraphics` from the `graphicx` package. Always specify the figure width as a multiple of the line width as in the example below:

```
\usepackage[pdftex]{graphicx} ...
\includegraphics[width=0.8\linewidth]{myfile.pdf}
```

See Section 4.4 in the graphics bundle documentation (<http://mirrors.ctan.org/macros/latex/required/graphics/grfguide.pdf>)

A number of width problems arise when L<sup>A</sup>T<sub>E</sub>X cannot properly hyphenate a line. Please give LaTeX hyphenation hints using the `\-` command when necessary.

## Acknowledgments and Disclosure of Funding

Use unnumbered first level headings for the acknowledgments. All acknowledgments go at the end of the paper before the list of references. Moreover, you are required to declare funding (financial activities supporting the submitted work) and competing interests (related financial activities outside the submitted work). More information about this disclosure can be found at: <https://neurips.cc/Conferences/2022/PaperInformation/FundingDisclosure>.

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The checklist follows the references. Please read the checklist guidelines carefully for information on how to answer these questions. For each question, change the default **[TODO]** to **[Yes]**, **[No]**, or **[N/A]**. You are strongly encouraged to include a **justification to your answer**, either by referencing the appropriate section of your paper or providing a brief inline description. For example:

- Did you include the license to the code and datasets? **[Yes]** See Section 4.
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Please do not modify the questions and only use the provided macros for your answers. Note that the Checklist section does not count towards the page limit. In your paper, please delete this instructions block and only keep the Checklist section heading above along with the questions/answers below.

1. For all authors...
  - (a) Do the main claims made in the abstract and introduction accurately reflect the paper's contributions and scope? **[TODO]**
  - (b) Did you describe the limitations of your work? **[TODO]**
  - (c) Did you discuss any potential negative societal impacts of your work? **[TODO]**
  - (d) Have you read the ethics review guidelines and ensured that your paper conforms to them? **[TODO]**
2. If you are including theoretical results...
  - (a) Did you state the full set of assumptions of all theoretical results? **[TODO]**
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3. If you ran experiments...
  - (a) Did you include the code, data, and instructions needed to reproduce the main experimental results (either in the supplemental material or as a URL)? **[TODO]**
  - (b) Did you specify all the training details (e.g., data splits, hyperparameters, how they were chosen)? **[TODO]**
  - (c) Did you report error bars (e.g., with respect to the random seed after running experiments multiple times)? **[TODO]**
  - (d) Did you include the total amount of compute and the type of resources used (e.g., type of GPUs, internal cluster, or cloud provider)? **[TODO]**
4. If you are using existing assets (e.g., code, data, models) or curating/releasing new assets...
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  - (d) Did you discuss whether and how consent was obtained from people whose data you're using/curating? **[TODO]**
  - (e) Did you discuss whether the data you are using/curating contains personally identifiable information or offensive content? **[TODO]**
5. If you used crowdsourcing or conducted research with human subjects...
  - (a) Did you include the full text of instructions given to participants and screenshots, if applicable? **[TODO]**
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## **A Appendix**

Optionally include extra information (complete proofs, additional experiments and plots) in the appendix. This section will often be part of the supplemental material.