

APRIL: Annotations for Policy evaluation with Reliable Inference from LLMs

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Abstract

Off-policy evaluation (OPE) estimates the value of a contextual bandit policy prior to deployment. As such, OPE plays a critical role in ensuring safety in high-stakes domains such as healthcare. However, standard OPE approaches are limited by the size and coverage of the behavior dataset. While previous work has explored using expert-labeled counterfactual annotations to enhance dataset coverage, obtaining such annotations is expensive, limiting the scalability of prior approaches. We propose leveraging large language models (LLMs) to generate counterfactual annotations for OPE in medical domains. Our method uses domain knowledge to guide LLMs in predicting how key clinical features evolve under alternate treatments. These predicted features can then be transformed using known reward functions to create counterfactual annotations. We first evaluate the ability of several LLMs to predict clinical features across two patient subsets in MIMIC-IV, finding that state-of-the-art LLMs achieve comparable performance. Building on this capacity to predict clinical features, we generate LLM-based counterfactual annotations and incorporate them into an OPE estimator. Our empirical results analyze the benefits of counterfactual annotations under varying degrees of shift between the behavior and target policies. We find that in most cases, the LLM-based counterfactual annotations significantly improve OPE estimates up to a point. We provide an entropy-based metric to identify when additional annotations cease to be useful. Our results demonstrate that LLM-based

counterfactual annotations offer a scalable approach for addressing coverage limitations in healthcare datasets, enabling safer deployment of decision-making policies in clinical settings.

Keywords: off-policy evaluation, synthetic datasets, contextual bandits

Data and Code Availability This paper uses data from the broadly available MIMIC-IV dataset. Code is available on [Github](#).

Institutional Review Board (IRB) This research does not require IRB approval.

1. Introduction

Off-policy evaluation (OPE) methods estimate the value of a new (target) contextual bandit policy using a behavior dataset of samples collected under a distinct behavior policy (Sutton and Barto, 2018). OPE can be particularly useful in high-stakes domains such as healthcare, where evaluating policies by directly deploying them is either impossible or unethical. Standard approaches to OPE include importance sampling (Precup et al., 2000), the direct method (Beygelzimer and Langford, 2009), and doubly robust approaches (Dudik et al., 2014). However, the performance of OPE estimators is inherently limited by the coverage of the behavior dataset. When the target policy takes actions that are under-observed in the behavior dataset, standard OPE methods cannot reliably estimate the value of these actions, leading to inaccurate policy value estimates.

To address this, recent work proposes augmenting the behavior dataset with counterfactual anno-

tations (Tang and Wiens, 2023). A counterfactual annotation is a prediction of the scalar reward resulting from an action unobserved in the behavior dataset. For example, if a patient received 20mEq of potassium, a counterfactual annotation would predict the reward had the patient instead received 40mEq. Two strategies have been developed to incorporate such annotations into OPE: one augments an importance sampling-based estimator (Tang and Wiens, 2023), and the other augments a doubly robust estimator (Mandyam et al., 2024). Both demonstrate that incorporating counterfactual annotations can improve OPE estimates, but these approaches rely on human experts (e.g., clinicians) to provide the annotations, which is costly and difficult to scale.

To address this, we propose a pipeline to source counterfactual annotations for OPE in clinical settings using large language models (LLMs). LLMs have the ability to reason effectively about medical domains, with the capacity to answer medical questions (Singhal et al., 2023b), perform differential patient diagnoses (Nori et al., 2025), and reason about medical images (Zhou et al., 2025). Our approach leverages LLMs to predict clinical features of interest such as downstream laboratory measurements; we then incorporate these predictions into known reward functions to produce synthetically generated counterfactual annotations.

We evaluate our proposed framework on two clinical tasks: intravenous (IV) potassium and sodium repletion. Both are critical procedures in clinical practice, where large errors in administration can lead to adverse outcomes (Voldby and Brandstrup, 2016). Furthermore, these are routine procedures with well-established guidelines for treatment and reasonably predictable treatment response curves, making them especially tractable settings for applying contextual bandit algorithms. We construct corresponding patient datasets from the Medical Information Mart for Intensive Care IV (MIMIC-IV) database, which contains electronic health records (EHR) for patients admitted to the Beth Israel Deaconess Medical Center (Johnson et al., 2024, 2023; Goldberger et al., 2000). We first assess the ability of several LLMs to predict relevant clinical features, including serum potassium and sodium values. Using clinically motivated reward functions, we then transform these predictions into counterfactual annotations. Our results show that LLM-generated counterfactual annotations improve OPE estimates, particularly under large dis-

tribution shifts between the behavior and target policies.

Our contributions follow:

- **We perform OPE with LLM-generated counterfactual annotations in a multi-cohort setting** using MIMIC-IV. We systematically evaluate multiple general-purpose LLMs for their accuracy in predicting downstream clinical features.
- **We show that incorporating LLM-generated annotations can significantly improve OPE estimates**, reducing RMSE relative to baselines and confirming prior findings in real-world data.
- **We demonstrate that additional counterfactual annotations offer diminishing returns**, a phenomenon captured quantitatively via the marginal entropy over the action distribution.

2. Preliminaries

2.1. Problem setting

We adopt a contextual bandit setting, as potassium and sodium repletion are short-horizon decisions whose outcomes can be observed within a single timestep. A contextual bandit setting is represented as $(\mathcal{S}, \mathcal{A}, \mathcal{R}, d_0)$, where \mathcal{S} is the discrete context space, \mathcal{A} is the discrete action space, \mathcal{R} is the reward distribution, and d_0 is the initial context distribution. The reward function $R : \mathcal{S} \times \mathcal{A} \rightarrow [0, 1]$ assigns a scalar reward between 0 and 1. Our goal is to evaluate a target contextual bandit policy π_e by estimating its value $v(\pi_e) = \mathbb{E}_{s \sim d_0, a \sim \pi_e} [R(s, a)]$ using a behavior dataset. The behavior dataset consists of samples $D = \{s_i, a_i, r_i\}_{i=1}^N$, where the actions are sampled from a behavior policy π_b .

2.2. Off-policy evaluation estimators

Many OPE estimators fall into three broad categories: importance sampling (IS), the direct method (DM), and doubly robust (DR) estimators. IS methods (Precup et al., 2000) re-weight each sample in the behavior dataset using an inverse propensity score (IPS) $\frac{\pi_e(a_i|s_i)}{\pi_b(a_i|s_i)}$. The second class includes direct-method (DM) approaches (Beygelzimer and Langford, 2009), which learn a reward model \hat{R} from the behavior dataset, and use the model

to simulate the returns of samples from the target policy. The final category includes doubly-robust (DR) approaches (Dudik et al., 2014; Jiang and Li, 2016), which combine strategies from IS and DM approaches, providing favorable theoretical guarantees when either the IPS ratio is known or the reward model is of high quality.

Recent work has proposed supplementing the behavior dataset with counterfactual annotations solicited from an expert. Tang and Wiens (2023) introduce an IS-based estimator and demonstrate that counterfactual annotations can improve OPE estimates when the annotations are of high quality. Mandyam et al. (2024) extends this to a doubly robust setting, mitigating the negative impacts of noisy or imperfect annotations. Both approaches assume that counterfactual annotations are expert-labeled, which limits the scalability of the proposed approaches. Other work has proposed using a variational auto-encoder to generate synthetic trajectories, thus enriching state-action coverage of the behavior dataset and tightening variance bounds (Gao et al., 2024). Our work builds on these approaches, identifying a scalable alternative to creating counterfactual annotations.

2.3. Generative models can encode medical knowledge

LLMs have shown impressive general medical reasoning capabilities. Models fine-tuned on web and biomedical corpora now match or surpass physicians on multiple-choice benchmarks such as MedQA (Jin et al., 2020). DeepMind’s Med-PaLM 2 (Singhal et al., 2023a) and Gemini models (Saab et al., 2024) illustrate that scaling and instruction tuning can boost performance across a range of clinical knowledge tasks. However, these works center on general medical knowledge questions rather than reasoning about individual patient clinical trajectories, which is the focus of our work.

More granular, patient-specific LLM applications are beginning to emerge, including reasoning about how laboratory values evolve over a patient trajectory. Bhasuran et al. (2025) explore differential-diagnosis generation from brief clinical vignettes, highlighting the importance of structured patient summaries to improve LLM outputs. He et al. (2024) evaluate the ability to generate accurate and safe responses to patient lab-result inquiries using prompt engineering and detailed quality evaluation metrics.

These studies suggest that LLMs can reason about patients when provided with curated input and task framing (Wei et al., 2022; Chung et al., 2022). Our work leverages prompting strategies that build on those used in these works to guide LLMs in generating patient-specific counterfactual annotations.

2.4. Synthetic data for machine learning

In our setting, supervision comes from both a real-world dataset and a noisier set of synthetic data. Using a noisy secondary dataset is a common paradigm in supervised learning, and methods to mitigate the covariance shift between the datasets have been extensively studied in the *robust machine learning* literature. Earlier results introduced transfer learning techniques to learn features from secondary datasets while mitigating issues with higher-variance samples (Krizhevsky et al., 2012; Pan and Yang, 2010; Ben-David et al., 2006; Sugiyama et al., 2007; Quiñonero-Candela et al., 2008). Other methods such as prediction-powered inference (Angelopoulos et al., 2023) explicitly correct for possible biases that result from the introduction of synthetic samples.

3. Methods

3.1. Dataset

We conduct our analysis using the MIMIC-IV dataset, partitioned into two subsets of non-ICU patients. The first subset includes all patients who received IV potassium, and the second includes all patients who received IV hypertonic (3%) saline. For each patient in the potassium and sodium subsets, we represent the clinical context as a feature vector comprising 15 variables that characterize the patient’s state four hours prior to treatment (i.e., administration of potassium or saline). We focus on a four-hour window because this corresponds to the highest frequency of electrolyte administration observed in our dataset, with patients receiving electrolytes at most once every four hours. The features used to represent the clinical context include laboratory results, vital signs, administered medications, and static covariates such as age and gender. A complete list of features is provided in Appendix A. The action space corresponds to the administered dosage, represented in milliequivalents (mEq). For potassium administration, the dosage action space is $A = \{0, 10, 20, 40\}$. For sodium (i.e., hypertonic saline) administration,

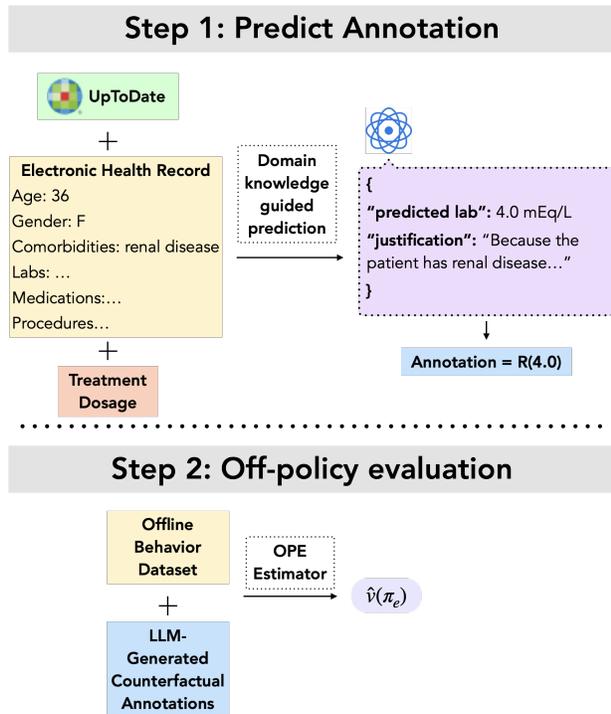


Figure 1: **Our work improves OPE estimates using LLM-generated counterfactual annotations.** We first query counterfactual annotations using domain knowledge guided prediction. We calculate the annotations using a known reward function R . Finally, we incorporate the counterfactual annotations and offline behavior dataset to learn an OPE estimate $\hat{v}(\pi_e)$.

dosages are discretized to accommodate our assumption of a discrete action space, yielding an action space $A = \{0, 100, 200, 300, 400, 500\}$.

Similar to prior work (Prasad, 2020), we adopt a reward function defined as a function of the clinical context observed following the administration of a treatment dosage. Specifically, the scalar reward depends on a single laboratory measurement in the next observed context. For patients who receive IV potassium, this is a serum potassium lab, and for patients who receive IV hypertonic saline, this is a serum sodium lab. The reward function

$$R(x) = \begin{cases} \exp\left(-\frac{1}{2}\left(\frac{x-a}{2.5}\right)^2\right), & x < a \\ 1, & a \leq x \leq b \\ \exp\left(-\frac{1}{2}\left(\frac{x-b}{2.5}\right)^2\right), & x > b \end{cases}$$

takes as input a laboratory value x , and uses the lower bound (a) and upper bound (b) of the reference range to calculate a scalar reward. This reward function design reflects the clinical goal of repletion which is to bring a patient’s electrolyte level into the normal range and keep it there, while smoothly penalizing deviations outside the range. Visual representations of the reward function can be seen in Appendix Figure 4.

3.2. Generating Counterfactual Annotations using LLMs

As described in Section 3.1, the reward functions for each decision-making task are functions of a single lab value. Therefore, generating a counterfactual annotation requires predicting the specified lab value under a counterfactual treatment dosage.

We construct prompts that include information about the patient’s clinical state, a paragraph that cites the most relevant features for lab value prediction sourced from UpToDate (Kluwer, n.d.), and a query about the lab value had an alternative treatment dosage been administered (example in Appendix B). Building on prior work (Hegselmann et al., 2025), we organize the patient’s information into categories such as comorbidities, laboratory results, and medications to create a structured text representation of the clinical state. Including features from UpToDate guides the LLM toward clinically relevant information, as EHRs often contain extraneous data that may not be predictive. To ensure structured outputs, we restrict the LLM’s response to a JSON object con-

301 taining two keys: the predicted lab value, and a justification for the prediction. This format allows for
 302 straightforward extraction of the numerical lab value
 303 and facilitates verification of the LLM’s reasoning.
 304

305 For potassium administration, dosages are assumed to be delivered at a rate of 10, mEq/hr, and
 306 for sodium administration, at a rate of 30, mEq/hr,
 307 corresponding to the most common rates observed in
 308 MIMIC-IV. The prompt also specifies that the lab value should be predicted three hours after the IV
 309 infusion concludes; this corresponds to the average
 310 number of hours that the lab value post treatment
 311 administration was measured. Once the LLM predicts the lab value, it is converted into a scalar counterfactual annotation using the corresponding known
 312 reward function.
 313
 314
 315
 316

317 3.3. Incorporating Counterfactual 318 Annotations into an OPE estimator

Once we generate counterfactual annotations, we must incorporate them into an OPE estimator. Prior methods for OPE with counterfactual annotations often assume that the IPS ratios are fully known. However, in this work, we must infer both π_b and π_e from finite sample sizes. To mitigate possible biases as a result of unknown IPS ratios, we choose to use a direct method estimator. The standard direct method estimator is

$$\hat{V}^{DM} = \sum_{s \in S} d_0(s) \sum_{a \in A} \pi(a|s) \hat{R}(s, a),$$

where \hat{R} is a reward function estimate learned from the behavior dataset. When we have access to both a behavior dataset and counterfactual annotations, we choose to use modified version of the standard DM estimator suggested by prior work work (Mandyam et al., 2024),

$$\hat{V}^{DM^+} = \sum_{s \in S} d_0(s) \sum_{a \in A} \pi(a|s) \hat{R}^+(s, a),$$

319 where \hat{R}^+ is learned using both the behavior dataset
 320 and counterfactual annotations. In this work, we approximate both \hat{R} and \hat{R}^+ using linear regression.
 321

322 3.4. Evaluation Setup

323 A standard metric for assessing the accuracy of
 324 an OPE estimator is the root mean squared error
 325 (RMSE), defined as

$$\text{RMSE} = \sqrt{\mathbb{E}[(\hat{v}(\pi_e) - v(\pi_e))^2]},$$

where $\hat{v}(\pi_e)$ denotes the value estimated by the OPE
 326 method, and $v(\pi_e)$ is the true value of the target policy
 327 π_e . In practice, $v(\pi_e)$ is rarely available, which
 328 complicates the evaluation of OPE estimators in real-
 329 world settings.
 330

To address this limitation in the MIMIC-IV
 331 dataset, we adopt a controlled evaluation strategy.
 332 We partition each dataset subset into disjoint behavior
 333 and target sub-cohorts, and infer corresponding
 334 policies via behavior cloning. Because the target sub-
 335 cohort contains observed rewards, we approximate
 336 the value of the cloned target policy by averaging
 337 these rewards. The fidelity of this approximation depends
 338 on how well the policies are cloned; to assess this,
 339 we evaluate the cloned policies’ accuracy on a held-out
 340 validation set and find that they perform well in
 341 reproducing the observed treatment decisions (e.g.,
 342 validation accuracy $\geq 90\%$). This gives us confidence
 343 that the averaged rewards in the target subset provide
 344 a reliable reference value against which to compute
 345 RMSE for different OPE estimators.
 346

It is well known that the performance of OPE estimators
 347 depends considerably on the distribution shift between
 348 the behavior dataset and the samples induced by the
 349 target policy. To systematically study the effect of
 350 LLM-generated counterfactual annotations on an OPE
 351 method under varying degrees of distribution shift,
 352 we construct three behavior–target dataset pairs for
 353 each subset of patients from MIMIC-IV. The first pair
 354 splits by gender, with female patients forming the
 355 behavior dataset and male patients the target dataset.
 356 The second pair splits by comorbidity status: for
 357 potassium repletion, patients without renal disease
 358 form the behavior dataset and patients with renal
 359 disease the target dataset; for sodium repletion,
 360 the split is based on cirrhosis. We choose these
 361 comorbidities because their presence is likely to
 362 influence the patient’s response to drug administration.
 363 The third pair separates patients by drug dosage,
 364 using low-dosage patients as the behavior dataset
 365 and high-dosage patients as the target dataset. These
 366 partitions are designed to reflect clinically meaningful
 367 subgroups while also inducing progressively larger
 368 divergences between the behavior and target policies.
 369 This allows us to evaluate when counterfactual
 370 annotations generated by LLMs yield improvements
 371 in OPE accuracy.
 372

4. Experiments

Our empirical analyses seek to answer the following questions: **(1)** Can LLMs accurately predict downstream patient laboratory values after a treatment is administered? **(2)** Under what conditions do LLM-generated counterfactual annotations improve OPE estimates? **(3)** How do OPE estimates vary as the number of synthetic counterfactual annotations increases?

To address these questions, we use five LLMs spanning a range of parameter counts: OpenAI’s `o1` (OpenAI et al., 2024), `o3-mini` (Zhang et al.), and `gpt-4o-mini` (Hurst et al., 2024), Google’s Gemini 1.5 (Reid et al., 2024), and Anthropic’s Claude 3.7 Sonnet (Cla). All models are hosted on an internal, sandboxed cluster to ensure HIPAA compliance with the MIMIC-IV dataset. All experiments were conducted with a temperature setting of zero whenever supported. For `o1` and `o3-mini`, which do not expose a temperature parameter, we use the default configuration.

4.1. LLMs can predict downstream lab values on real patient populations

We first evaluate whether LLMs can accurately predict serum potassium and serum sodium laboratory values. In realistic deployment, the target patient population may not be directly accessible, so we assess predictive performance using behavior datasets from each sub-cohort split. To generate predictions, we prompt the LLM following the procedure in Section 3.2, but instead of asking for counterfactual lab values, we request the lab value following the dosage administered in MIMIC-IV. Because the corresponding ground-truth lab values are observed in MIMIC-IV, we can directly quantify predictive accuracy. We evaluate accuracy using a weighted F1 score across clinically relevant categories of lab values (e.g., below reference range, within reference range, above reference range). The categories used to calculate the F1 score, and further details are reported in Section 3.1.

We find that LLMs can predict serum potassium and serum sodium lab values with clinically meaningful degrees of accuracy (Table 1, visualized in Appendix Figure 6). First, we note that serum potassium lab values are predicted more accurately than serum sodium lab values, likely due to the wider distribution and higher prevalence of outliers in sodium lab measurements. We also find that the performance of a given LLM remains consistent across co-

horts within each prediction task, which suggests that predictive accuracy does not strongly depend on the underlying patient population. Finally, the differences in predictive accuracy across LLMs are modest, suggesting that multiple models are capable of producing reliable predictions of downstream lab values. Furthermore, these results demonstrate our proposed framework’s ability to produce counterfactual annotations of reasonable quality. In particular, because LLMs can predict downstream lab values within a degree of accuracy that is clinically relevant, the resulting annotations are likely to be useful for OPE.

4.2. LLM-produced counterfactual annotations can improve OPE estimates

We next evaluate the utility of LLM-generated counterfactual annotations for OPE, following the setup in Section 3.4. We report results for the potassium repletion task in Figure 2, and for the sodium repletion task in Appendix Figure 7. Our results show that counterfactual annotations substantially improve OPE estimates in settings with large distribution shifts between the actions observed in the behavior and target policies. Across both the potassium and sodium repletion tasks, the reported RMSE reflects the relative difficulty of estimating $v(\pi_e)$ under each cohort split. For example, in the gender cohort split, where behavior and target policies are nearly identical, the RMSE is already near zero without counterfactual annotations, leaving little room for improvement. In contrast, in the dosage cohort split, where behavior and target policies have little overlap, the baseline RMSE of DM is highest, reflecting the difficulty of the task. Here, the incorporation of counterfactual annotations produces the largest reductions in RMSE, indicating that annotations are most valuable when behavior and target policies diverge strongly. Specifically, in the potassium dosage cohort, counterfactual annotations can reduce RMSE by 83%, and in the sodium dosage cohort by 49%.

We also find that the performance of DM^+ varies with the choice of LLM used to generate counterfactual annotations. In the potassium repletion task, annotations from `o1` yield the best performance as shown by lowest RMSE, whereas in the sodium repletion task, annotations from `gpt-4o-mini` and `o3-mini` yield the best performance. Although the best-performing LLM is not consistent across tasks or cohort splits, counterfactual annotations consistently

Task	Cohort	o1	gpt-4o-mini	o3-mini	Gemini	Claude 3.7
Potassium Repletion	Gender	0.856	0.809	0.854	0.858	0.866
	Comorbidity	0.871	0.787	0.869	0.872	0.879
	Dosage	0.878	0.791	0.876	0.879	0.885
Sodium Repletion	Gender	0.758	0.774	0.738	0.749	0.776
	Comorbidity	0.771	0.801	0.753	0.779	0.796
	Dosage	0.772	0.809	0.768	0.780	0.804

Table 1: **All LLMs perform comparably across potassium and sodium lab prediction.** Predictions are evaluated using weighted F1 scores across clinically relevant lab value categories. The best performing LLM within each cohort is in bold.

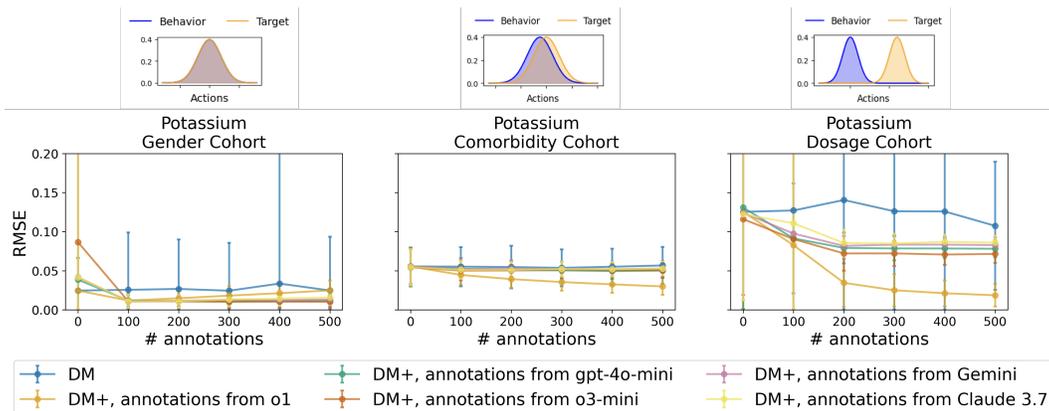


Figure 2: **LLM-generated counterfactual annotations improve OPE estimates in settings with high divergence between actions observed in behavior and target policies.** We report results for the potassium repletion task. Our baseline is a direct method estimator (blue) that does not use counterfactual annotations. The performance of DM^+ with annotations from each LLM is reported in the corresponding colors. Error bars represent standard error across 500 bootstrapped datasets sampled with replacement. Since RMSE is non-negative, the lower bound of the error bars is truncated at 0 where necessary. Figures above each plot demonstrate the difference in distribution of actions observed in the behavior and target policies.

470 reduce RMSE in the most challenging settings (e.g.,
471 dosage cohorts), regardless of the LLM used.

472 Finally, to assess statistical significance, we compare
473 DM and DM^+ using a paired t-test, with DM^+
474 learned using 500 counterfactual annotations (Section
475 4.2). In nearly all settings, DM^+ achieves significantly
476 lower RMSE than DM . The main exception is the gender
477 split in both potassium and sodium tasks, where annotations
478 from some LLMs do not yield a meaningful performance
479 improvement. This outcome is expected, given the substantial
480 overlap between behavior and target policies in the gender
481 cohorts, which allows DM to perform well even without
482 counterfactual annotations.
483

4.3. Additional counterfactual annotations yield marginal improvements in OPE estimates

484 A key consideration when using synthetic data in
485 machine learning is determining the point at which
486 adding further synthetic samples no longer provides
487 benefits. In our setting, a single source of counterfactual
488 annotations can generate at most $N \cdot (|\mathcal{A}| - 1)$
489 unique annotations, where $|\mathcal{A}|$ is the number of actions
490 and N is the number of samples in the behavior
491 dataset. When multiple sources are available, each
492 source provides separate predictions for unobserved
493 actions, which can either be combined or averaged.
494 Direct combination increases the total number of an-
495
496
497

Task	Cohort	o1	gpt-4o-mini	o3-mini	Gemini	Claude 3.7
Potassium Repletion	Gender	5.4E-31	9.8E-03	3.0E-04	3.7E-01	2.4E-01
	Comorbidity	1.5E-94	1.3E-08	1.1E-07	7.7E-03	5.7E-04
	Dosage	1.3E-83	1.7E-14	1.9E-20	7.2E-11	1.4E-08
Sodium Repletion	Gender	1.9E-03	7.0E-04	1.5E-19	7.5E-14	6.6E-08
	Comorbidity	1.0E-07	2.0E-16	2.0E-03	1.0E-04	2.2E-05
	Dosage	2.8E-37	3.0E-15	3.2E-57	1.44E-44	7.79E-39

Table 2: **In most cohorts across both tasks, LLM-generated annotations significantly improve RMSE.** We compare RMSE distributions for DM and DM^+ with 500 counterfactual annotations using a paired t-test, and report p-values. P-values shown in red indicate results that are not statistically significant ($p \geq 0.05$) or cases where RMSE does not improve relative to DM ($t < 0$).

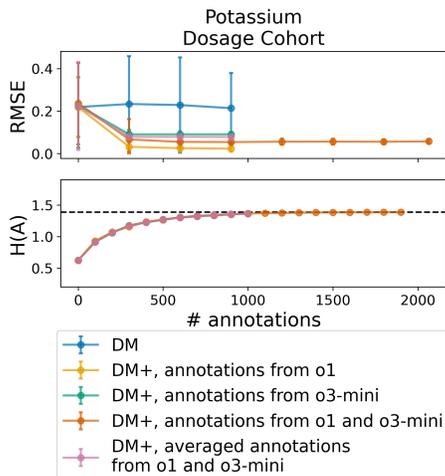


Figure 3: **Combining annotation sources yields limited returns.** (Top) We compare DM to DM^+ with annotations from the best-performing LLMs for potassium repletion in the dosage cohort, with two aggregation methods: pooling predictions and averaging annotations. Error bars show standard error over 500 bootstrapped datasets, truncated at 0. (Bottom) Marginal entropy over the action space $H(A)$ when adding counterfactual annotations to the behavior dataset for the potassium cohort. The dashed line marks the maximum possible entropy.

notations, whereas averaging maintains the same total count. We study both strategies for the potassium task (Figure 3) and sodium task (Figure 9).

We focus on the dosage cohort splits for both tasks, where counterfactual annotations have the greatest impact in reducing RMSE due to minimal overlap between the behavior and target policies. Specifically, we examine combinations of the two LLMs whose counterfactual annotations yield the best performance for DM^+ : o1 and o3-mini for the potassium task, and Gemini and o3-mini for the sodium task. We find that, while adding counterfactual annotations initially reduces OPE error, the improvement quickly plateaus as more annotations are included. Averaging multiple sources does not provide additional gains beyond the best-performing single source. For instance, in the potassium task, averaging annotations from o1 and o3-mini yields OPE performance worse than using o1 alone, though slightly better than o3-mini alone. Similarly, combining annotations without averaging, which nearly doubles the number of annotations, does not improve OPE estimates relative to a single source. These results indicate that substantially increasing the number of counterfactual annotations provides limited utility.

To quantify the effect of additional annotations, we compute the marginal entropy over the action distribution. Entropy measures the overall uncertainty or spread of actions in the dataset. Formally, the marginal entropy over the action distribution is $H(A) = -\sum_{a \in A} \hat{p}(a) \ln(\hat{p}(a))$ where $\hat{p}(a)$ is the probability of observing a given action a , estimated empirically. The maximum entropy occurs when all actions are equally frequent, in which case $H(A) = \ln(|A|)$. We observe that, as the number of annotations increases, the action coverage approaches the maximum entropy, and further annotations yield

535 only marginal gains. In particular, at around 700 an-
 536 notations for the potassium task and 500 annotations
 537 for the sodium task, OPE improvements have largely
 538 plateaued, and the marginal action entropy is already
 539 near its maximum, indicating that additional coun-
 540 terfactual annotations provide little further utility.
 541 This analysis suggests that marginal entropy over the
 542 action space is a proxy that may be used to determine
 543 when to stop generating counterfactual annotations.

544 5. Discussion

545 In this work, we present a scalable strategy for gener-
 546 ating counterfactual annotations for OPE in clinical
 547 settings. We show that LLMs can reason over
 548 clinical contexts and predict downstream lab values,
 549 which in turn can be used to construct counterfactual
 550 annotations. Focusing on the potassium and sodium
 551 repletion tasks, we demonstrate that this approach
 552 leads to substantial improvements in OPE estimates,
 553 particularly when there is considerable divergence be-
 554 tween the behavior and target policies. We recom-
 555 mend using LLM-generated annotations when there
 556 are known coverage gaps in the behavior dataset, and
 557 relying on an entropy-based metric to decide when
 558 additional counterfactual annotations are needed.

559 **Limitations and Future Work.** Our study is
 560 limited to reward functions that consider a single
 561 clinical feature. While our results provide evidence
 562 that LLMs can reliably predict these downstream lab
 563 values, future work should evaluate whether similar
 564 gains can be achieved for predicting more complex
 565 clinical outcomes.

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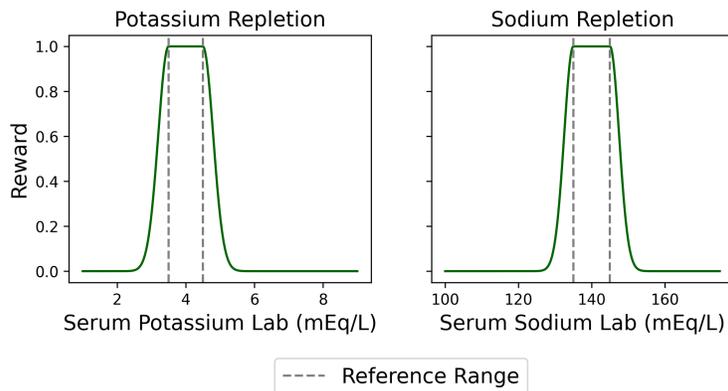


Figure 4: **Reward functions for both decision-making tasks are a function of the corresponding reference range.** Reward is bounded in the range $[0, 1]$, attaining its maximum when the lab value falls within the corresponding clinical reference range (3.5 – 4.5 mEq/L for serum potassium, and 135 – 145 mEq/L for serum sodium). As the lab value deviates from this range, the reward decreases according to a Gaussian decay, with the lowest rewards assigned to critically low or high values.

Appendix A. MIMIC-IV dataset

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The MIMIC-IV dataset consists of patient data for over 65,000 patients admitted to the ICU and over 200,000 patients admitted to the emergency department. This data is represented as electronic health records (EHRs), which capture a variety of information about each patient including static covariates such as age and gender, all hospital procedures and events such as lab measurements and administered medications, as well as indications of comorbidities. In this work, we consider non-ICU patients who have been administered either IV potassium, or IV hypertonic saline. We have 1622 patients who were administered IV potassium, and 1187 patients who were administered saline.

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We represent each patient context using the following 15 features: age, gender, weight, height, heart rate, respiratory rate, oxygen saturation pulseoxymetry, systolic blood pressure, diastolic blood pressure, serum creatinine lab, administered NaCl 0.9%, administered dextrose 5%, administered propofol, administered norepinephrine, and administered insulin. We choose these features due to their relevance in being able to predict downstream serum potassium and serum sodium labs (Kluwer, n.d.). The reward function for both tasks is visualized in Figure 4.

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When we report the accuracy of the LLM in predicting downstream lab values, we use weighted F1 score. The classes of predictions for potassium (all in mEq/L) are $[< 3.2, \geq 3.2$ and $< 5, \geq 5$ and $< 6, \geq 6]$. The classes of predictions for sodium (all in mEq/L) are $[< 118, \geq 118$ and $< 135, \geq 135$ and $< 152, \geq 152$ and $< 169, \geq 169]$.

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Appendix B. Prompts

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Here we include the format of the prompt used to query downstream lab value predictions. The format is consistent across both the potassium and sodium repletion tasks, and varies only based on individual patient details. The prompt consists of five components: task information, static covariates, labs and medicines, domain information from UpToDate, and a prediction query. An example prompt is shown in Figure 5.

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Appendix C. Additional Empirical Results

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Here, we include additional empirical results to support our claims in the main text. First, we report figures that demonstrate the quality of downstream lab predictions across LLMs for both potassium and sodium lab

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You are interested in the task of predicting a patient's serum sodium level as measured from a blood sample after administering a dose of NaCl 3% (Hypertonic Saline) through an intravenous line (IV). What follows is a description of the events that occurred in the last four hours of the patient's hospital stay that will help you predict the serum sodium level. These details include **[[## Reason for Admission ##]]**, **[[## Static Covariates ##]]**, **[[## Labs/Vitals/Procedures ##]]**, and **[[## Medications ##]]**.

[[## Reason for Admission ##]]

The patient was admitted at {admission time} and they were admitted for {admission reason}.

[[### Static Covariates ##]]

The patient is a {gender} who is {age} years old, weighs {weight} kgs, is {height} tall, and has the following comorbidities: {list of diagnoses}

[[### Labs/Vitals/Procedures ##]]

Here is a list of measured lab values and procedures for the patient during the last four hours: {labs, vitals, and procedures list}.

[[### Medications ##]]

Here is a list of medications the patient received during the last four hours: {list of medications}

UpToDate, a relevant health resource, suggests that the most important features to rely on to predict the outcome of {task} repletion include {sourced features from UpToDate}.

Recall that your goal is to predict a patient's {lab value} after administering a dose of {drug} through an IV. Remember that the patient's latest {lab name} is {most recent lab value} mEq/L.

The patient will receive a total dosage of {dosage} mEq of {drug} through an IV drip. The drip will start at {drug start time} and be delivered at {rate}. What will the patient's {lab value} be 3 hours after receiving this dose of {drug}? Examine the patient clinical record description, which includes labs, vitals, comorbidities, medications administered, especially {drug} dosages, and the timing of those details.

Then, based on all available relevant factors, determine the most likely numeric {lab value} following {drug} administration. Phrase your response as a JSON file. The file should have two keys. One for the predicted lab value, in mEq/L, titled predicted_lab_value, and one for the justification titled justification. An example of this type of file is the following: {example file}. In this example, insert your predicted lab value in the list for the first key, and the justification in the list for the second key. Remember not to include units in the prediction and make sure that the prediction is a single number and not a range.

Figure 5: **LLMs can be prompted to construct downstream lab value predictions.** The prompt contains separate components that first describe the patient's clinical state four hours prior to receiving treatment, and then contains instructions to perform the lab value prediction. The prompt includes relevant information from UpToDate, a clinical resource, to help an LLM identify which features in the medical record are most predictive.

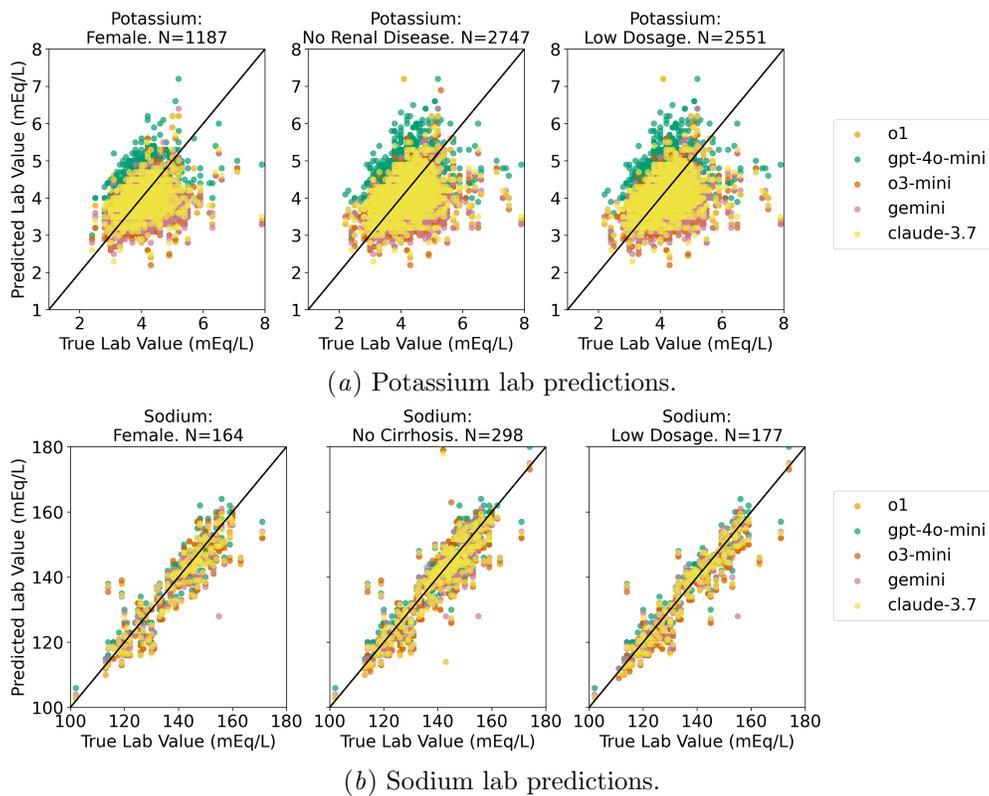


Figure 6: **LLMs can accurately predict sodium and potassium lab values in MIMIC-IV.** Predictions are evaluated using weighted F1 scores across clinically relevant lab value categories. The black line denotes perfect agreement with ground truth, and predictions from a different LLM are reported in different colors.

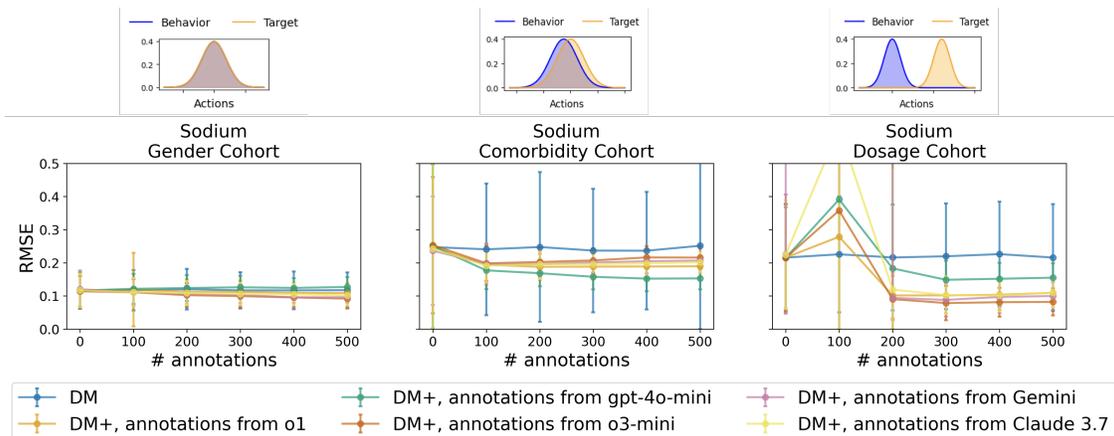


Figure 7: **LLM-generated counterfactual annotations improve OPE estimates for sodium repletion in settings with high divergence between behavior and target policies.** We report results using the *DM* baseline (blue) which uses no annotations, and *DM*⁺ with annotations from different LLMs in other colors. Error bars represent standard error across 500 bootstrapped datasets, truncated at 0 when necessary.

1275 predictions (Figure 6). Our results conclude similarly to those reported in Table 1, suggesting that LLMs
 1276 can predict downstream lab values within clinically relevant degrees of error.

1277 Furthermore, we investigate whether the age and gender of the patient affects the accuracy of the LLM
 1278 in predicting potassium and sodium levels. We find that the prediction error varies substantially depending
 1279 on the model and trends are not consistent given a patient’s age or gender. (Figure 8).

1280 Now we discuss the utility of LLM-generated counterfactual annotations within the sodium repletion
 1281 task (Figure 7). Similar to the potassium repletion results, we find that LLM-generated counterfactual
 1282 annotations help most when there is substantial divergence between the actions observed in the behavior
 1283 and target policies. Just as in the potassium task results, the most improvement due to annotations occurs
 1284 in the sodium dosage cohort.

1285 Finally, we report entropy and further annotations results for the sodium repletion task, suggesting that,
 1286 similar to the potassium repletion task, that more annotations may yield only marginal gains (Figure 9).

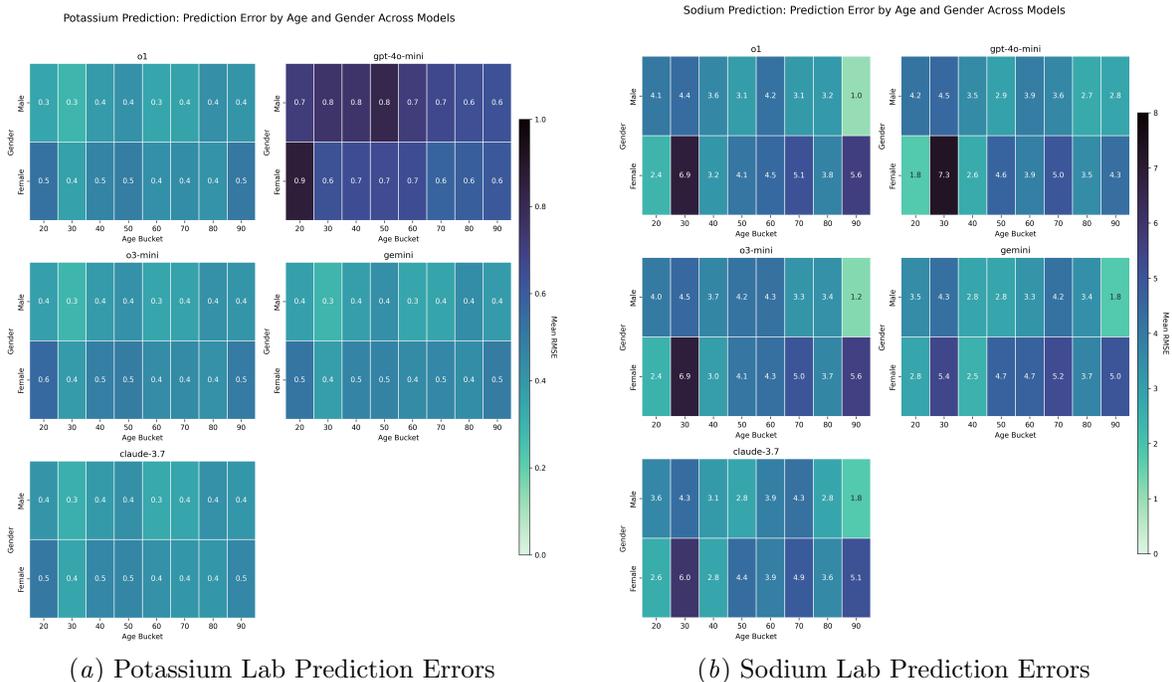


Figure 8: **Model prediction error varies depending on the patient’s age and gender.** However, the trends are not consistent as observed for both sodium prediction error (Figure 8(b)) and potassium prediction error (Figure 8(a)).

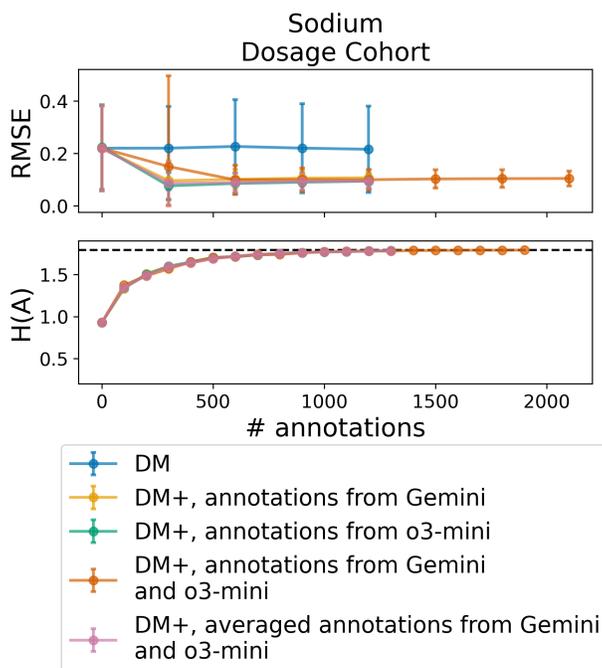


Figure 9: **Combining annotation sources yields limited returns in the sodium repletion task.** (Top) We compare DM^+ with the two best-performing LLMs for sodium repletion (yellow, green) and two aggregation methods: pooling predictions (orange) and averaging annotations (pink). Error bars show standard error over 500 bootstrapped datasets, truncated at 0. (Bottom) Marginal entropy over the action space $H(A)$ when adding counterfactual annotations to the behavior dataset for the sodium cohort. The horizontal dashed line marks the maximum possible entropy.