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The Foundational Skill of Reflection in the Formation of a Professional Identity

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ARTICLE

Neil Hamilton

The Foundational Skill of Reflection in the Formation of a Professional Identity

Abstract. There is a growing scholarly literature on the professional development and formation of law students into the core values, guiding principles, and well-being practices considered foundational to successful legal practice.* This growing scholarly literature can guide effective curriculum development to foster student growth toward later stages of development on these learning outcomes. This Article focuses on the skill of reflection as one of the most effective curricular strategies to foster each student's growth toward later stages of these learning outcomes. This same curricular strategy will also be effective in engaging practicing lawyers to grow toward these same goals. Part II of the Article analyzes the available empirical studies on the importance

* For example, see NEIL HAMILTON & LOUIS BILIONIS, LAW STUDENT PROFESSIONAL DEVELOPMENT AND FORMATION: BRIDGING LAW SCHOOL, STUDENT, AND EMPLOYER GOALS (2022). This book defines the four major PD&F goals to include:

1. ownership of continuous professional development toward excellence at the major competencies that clients, employers, and the legal system need;
2. a deep responsibility and service orientation to others, especially the client;
3. a client-centered problem-solving approach and good judgment that ground each student's and lawyer's responsibility and service to the client; and
4. well-being practices.

Id. at 1–2. Holloran Center has published substantial earlier research on formation of law student professional identity. See *Holloran Research on Professional Formation*, UNIV. ST. THOMAS, <https://www.stthomas.edu/hollorancenter/holloranresearchonprofessionalformation/> [https://perma.cc/9NR2-REVJ].

of the skill of reflection for professional development and formation of new entrants into a profession. Part III focuses on medical education’s experience to build framework of observable activity on the skill of reflection. Part IV presents a Milestone Model on the skill of reflection. Part V of the Article provides a grading rubric for individual reflection writing assignments. Part VI discusses why guided reflection at key transition points for law students with a coach is the most effective curriculum.

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I. INTRODUCTION

Do you think that being a professional should involve the exploration of the values, guiding principles, and well-being practices (beyond knowledge of the law of lawyering) foundational to successful legal practice? Are you interested in effective ways to build these values, guiding principles, and practices into a law school's curriculum? Do you think that the skill of reflection is important to foster each student's and lawyer's growth toward these values, guiding principles, and well-being practices?

If you answer affirmatively to any of these three questions, there is support in legal education to help you. For example, "the revised [law school accreditation] standards make self-evaluation and reflection explicit elements of experiential [education][,]" namely, clinics and externships.¹ Professors Balsam, Brooks, and Reuter point out that the ABA Standards include Standard 303(a)(3)(iv), "listing self-evaluation as a necessary element in experiential coursework[,]"² Standard 304(b)(ii) "listing self-evaluation as a necessary aspect of clinics[,]"³ and Standard 304(c)(iii), (v) "listing . . . faculty-guided reflection as a necessary element for field placement courses."⁴ Also worth noting is that thirty-three law schools out of the 186 schools that have posted learning outcomes as of June 2020, have included the skill of reflection or self-evaluation as an institutional learning outcome for students.⁵

Recent 2022 accreditation changes offer more support to the development of each student's growth toward the values, guiding principles, well-being practices, and skill of reflection that are foundational to

1. Jodi S. Balsam et al., *Assessing Law Students as Reflective Practitioners*, 62 N.Y.L. SCH. L. REV. 49, 51 (2018) (footnote omitted).

2. *Id.* at 51 n. 9.

3. *Id.*

4. *Id.*

5. See School of Law: Holloran Center, *Learning Outcomes 302(c) and (d)*, U. OF ST. THOMAS, <https://www.stthomas.edu/hollorancenter/learningoutcomesandprofessionaldevelopment/learningoutcomesdatabase/learningoutcomes302c/> [<https://perma.cc/HLY5-949Q>] (identifying Ave Maria, Belmont, Chicago Kent, Cleveland Marshall, UConn, Creighton, CUNY, Drexel, Duke, Emory, Faulkner, Georgia State, Hofstra, Illinois, Indiana Bloomington, Iowa, Loyola New Orleans, Memphis, Mercer, Montana, Ohio State, Pace, Penn State Dickinson, Puerto Rico, Seattle, Southwestern, St. John's, Tennessee, Thomas Jefferson, UMass, University of Washington, Villanova, Washington University in St. Louis, Widener Commonwealth, and Widener-Delaware as schools that have included self-reflection or self-evaluation in their learning outcomes).

successful legal practice.⁶ On February 15, 2022, the ABA House of Delegates approved revisions to Standard 303 which requires each law school to “provide substantial opportunities for students” to develop their professional identities through various approaches to experiential learning.⁷ Additionally, there has been an upturn in scholarly literature supporting such a standard—the development and growth of a student’s professional identity through experiential learning as a conduit to the progression towards these values, principles, and practices (called PD&F learning outcomes).⁸ This literature can guide effective curriculum development to foster this type of student growth.

This Article concentrates on the skill of reflection and its ability to act as the most effective curricular strategy to foster a student’s growth toward later stages of PD&F learning outcomes. This same curricular strategy will also be effective in engaging practicing lawyers to move toward these same general goals. Part II of the Article analyzes the available empirical studies on the importance of the skill of reflection for professional development and formation of new entrants into a profession. Part III focuses on medical education’s (a field, in this regard, analogous to that of legal education) experience in building a framework of observable activity on the

6. Balsam et al., *supra* note 1, at 51 (noting “[p]art of the catalyst for [the growth of self-reflection] has been the newest revisions by the American Bar Association (ABA) to the law school accreditation standards”).

7. Current Standard 303(b) provides: “A law school shall provide substantial opportunities to students for . . . law clinics or field placement(s)[,] and . . . student participation in pro bono legal services” SECTION OF LEGAL EDUC. AND ADMISSIONS TO THE BAR, AM. BAR ASS’N, ABA STANDARDS AND RULES OF PROCEDURE FOR APPROVAL OF LAW SCHOOLS 2021-2022 [hereinafter 2021–2022 Standards], Standard 303(b).

8. For example, see NEIL HAMILTON & LOUIS BILIONIS, LAW STUDENT PROFESSIONAL DEVELOPMENT AND FORMATION: BRIDGING LAW SCHOOL, STUDENT, AND EMPLOYER GOALS 10 (forthcoming Cambridge Univ. Press, 2022). This book defines the four major PD&F goals to include:

1. ownership of continuous professional development toward excellence at the major competencies that clients, employers, and the legal system need;
2. a deep responsibility and service orientation to others, especially the client;
3. a client-centered problem-solving approach and good judgment that ground each student’s and lawyer’s responsibility and service to the client; and
4. well-being practices.

Id. Holloran Center has published substantial research on the formation of law student professional identity. See generally School of Law: Holloran Center, *Holloran Research on Professional Formation*, U. ST. THOMAS, <https://www.stthomas.edu/hollorancenter/holloranresearchonprofessionalformation/> [https://perma.cc/SA3D-YL88] (providing various resources discussing professional formation).

skill of reflection. Part IV presents a Milestone Model on the skill of reflection. Part V provides a grading rubric for individual reflection writing assignments. Lastly, Part VI discusses why guided reflection at key transition points for law students with a coach is the most effective curriculum.

II. EMPIRICAL STUDIES ON THE IMPORTANCE OF THE SKILL OF REFLECTION FOR PROFESSIONAL DEVELOPMENT AND FORMATION OF NEW ENTRANTS INTO A PROFESSION

There is substantial empirical research indicating that the skill of reflection is foundational to fostering a new entrant's growth toward internalizing the values, guiding principles, and well-being practices of a profession. In the 2001–2010 period, the Carnegie Foundation for the Advancement of Teaching funded five studies of higher education (law, medicine, nursing, clergy, and engineering) in which site visits were observed in an effort to study how professional schools educate professionals in their corresponding fields (lawyers, physicians, nurses, clergy, and engineers).⁹ All five studies defined the key values and capacities necessary for the formation of a professional identity to include “the internalization of a deep responsibility to the person served” (i.e., the client for lawyers).¹⁰ Four of the studies added (1) a commitment to excellence in all skills necessary to serve well, (2) moral reasoning, (3) a social responsibility to the general public in the area of the profession's service, and (4) an understanding and appreciation of interpersonal relationships.¹¹ All five studies agreed that the most effective curriculum to foster the development of such values and capacities includes both, reflecting on the innate responsibilities of the vocation and seeking opportunities to receive feedback, to reflect, and to self-assess.¹²

Empirical evidence from research on medical education suggests similar findings. *Teaching Medical Professionalism: Supporting the Development of a Professional Identity* emphasizes that “a strong professional identity requires that students develop a proactive stance toward their own learning and career choices,” and further, “[o]ne of the [central] points of convergence

9. Neil Hamilton, *Fostering Professional Formation (Professionalism): Lessons from the Carnegie Foundation's Five Studies on Educating Professionals*, 45 CREIGHTON L. REV. 763, 765 (2012).

10. *Id.* at 779.

11. *Id.* at 795.

12. *Id.* at 783–84, 786.

among educational researchers concerned with formation of identity is the importance of developing habits of self-reflection among students.”¹³ Professional identity develops over time from “a long-term combination of experiences and reflection on experience”¹⁴ Thus the curriculum should provide multiple opportunities for guided reflection on experiences, namely in the socialization and employment context, with feedback to the student.¹⁵

A third set of empirical studies emphasizing the importance of reflection bases its findings on a moral psychology’s model of the four capacities necessary for a moral action. The Four Component Model (FCM) emerges out of moral psychology research and begins with the inquiry:

What must we suppose happens psychologically in order for moral behavior to take place? Morality in this meaning focuses on the social condition that humans live in groups and what one person does can affect others. . . . [M]orality provides

13. See William M. Sullivan, *Foreword*, in *TEACHING MEDICAL PROFESSIONALISM: SUPPORTING THE DEVELOPMENT OF A PROFESSIONAL IDENTITY* at ix, xiv (Richard L. Creuss et al. eds., 2d ed. 2016) [hereinafter *TEACHING MEDICAL PROFESSIONALISM*] (“Carried on in a context explicitly structured around the norms of professionalism, reflection proves an important aid toward becoming a self-directed learner, an essential quality for a successful later life as a physician.”); see also Sylvia R. Creuss & Richard L. Creuss, *General Principles for Establishing Programs to Support Professionalism and Professional Identity Formation at the Undergraduate and Postgraduate Levels*, in *TEACHING MEDICAL PROFESSIONALISM*, *supra*, at 113, 119 (“[I]t is clear that fundamental to encouraging students to actively participate in the development of their own professional identities is reflection”).

14. Yvonne Steinert, *Faculty Development to Support Professionalism and Professional Identity Formation*, in *TEACHING MEDICAL PROFESSIONALISM*, *supra* note 13, at 124, 132 (quoting Sean R. Hilton & Henry B. Slotnick, *Proto-Professionalism: How Professionalisation Occurs Across the Continuum of Medical Education*, 39 *MED. EDUC.* 58, 63 (2005)); see Hilton & Slotnick, *supra*, at 59 (“Skills, knowledge[,] and experience are necessary for professionalism, but sophisticated reflection on the doctor’s part is also required to produce insights enabling the individual to better address the needs of patients specifically, and society generally.”).

15. See Richard L. Creuss & Sylvia R. Creuss, *Professionalism and Professional Identity Formation: The Cognitive Base*, in *TEACHING MEDICAL PROFESSIONALISM*, *supra* note 13, at 5, 16 (“[T]he organization of [] curriculum must ensure that role modeling and mentoring are positive aspects of the process of socialization, and that appropriate clinical experiences take place.”); see also Robert Sternszus, *Developing a Professional Identity: A Learner’s Perspective*, in *TEACHING MEDICAL PROFESSIONALISM*, *supra* note 13, at 26, 34 (“[E]xplicit teaching should be done in parallel with exposure to authentic and positive clinical work environments, so that learners can be given opportunities for guided reflection”).

guidelines for both optimizing the mutual benefit of people living in groups and resolving conflicts among them.¹⁶

The FCM posits that four distinct capacities are essential for moral behavior to arise: (1) moral sensitivity (perceptual clarity and empathy),¹⁷ (2) moral reasoning and judgment,¹⁸ (3) moral motivation and identity,¹⁹ and (4) moral implementation.^{20, 21} These are analyzed in detail in the author's earlier scholarship on the FCM.²² That analysis concluded that the most effective curriculum to promote each student's growth to later stages of development on each of the four components includes:

1. Considering each student's developmental stage and "provid[ing] stage-appropriate educational engagements";²³
2. Creating optimal conflict or cognitive dissonance to challenge each student's existing ideas and assumptions;
3. Fostering each student's reflective judgment; and
4. Providing repeated opportunities for reflective self-assessment on all four components throughout the curriculum.²⁴

A fourth data set emphasizing the importance of the skill of reflection is discussed in the author's study (with Verna Monson) of Minnesota professionalism award winners. The award winners similarly emphasized the importance of the habit of ongoing reflection and learning in their

16. Neil W. Hamilton & Verna Monson, *Legal Education's Ethical Challenge: Empirical Research on How Most Effectively to Foster Each Student's Professional Formation (Professionalism)*, 9 U. ST. THOMAS L.J. 325, 345–46 (2011); Neil Hamilton, *Professionalism Clearly Defined*, 18 PRO. LAW. 1, 24 (2008).

17. See Hamilton & Monson, *supra* note 16, at 346 ("[I]nvolve[ing] being aware of alternative courses of action, knowing cause-consequence chains of events in the environment and how each could affect the parties concerned . . .") (citation omitted).

18. See *id.* at 347 ("[J]udg[ing] which line of action is more morally justifiable—which alternative is just, or right." (citation omitted)).

19. See *id.* at 347–48 ("[R]eferring to how the individual conceptualizes the moral self." (citation omitted)).

20. See *id.* at 348–49 ("[I]nvolve[ing] executing and implementing a play of action . . . [and] . . . figuring out the sequence of concrete actions . . ." (citation omitted)).

21. See *id.* at 346–49 (noting "a capacity that is underdeveloped may interfere with moral behavior").

22. *Id.*

23. See *id.* at 381 (suggesting such a consideration may be made by "asking the student to explore the meaning of the topics, materials, experience, and discussion to the individual student's internalized moral core").

24. *Id.* at 381–82.

career-long development.²⁵ Common themes from the interviewees included:

[O]ngoing reflection and learning (1) from mistakes or losses, and (2) about the limitations of the status quo of legal practice, including professional setbacks, i.e., failing to meet internalized standards of excellence, or losing important cases; personal setbacks, i.e., experiencing depression or loss of loved ones; alternative methods of practice (e.g., mediation); and the limitations of the justice system in serving the poor or oppressed, or imbalances of power²⁶

A fifth set of empirical studies derived from medical education found that those students who achieved higher scores on a “Reflection in Learning Scale” and in reflective self-efficacy correlated to superior academic performance in their second year.²⁷ Similarly, the study found, reflection skills also “improved clinical performance with standardized patients in third-year medical students.”²⁸ Studies point to reflection as essential to self-directed lifelong learning.²⁹

The empirical data strongly supports the postulation that reflection is a powerful curricular engagement that should figure prominently in a student’s growth toward later stages of the PD&F learning outcomes. The next section explores medical education’s experience in defining the most important sub-competencies of a skill like reflection, and the stages of development on each sub-competency.

25. Neil W. Hamilton & Verna Monson, *Ethical Professionalism (Trans)Formation: Themes from Interviews About Professionalism with Exemplary Lawyers*, 52 SANTA CLARA L. REV. 921, 949, 957 (2012).

26. *Id.* at 949, 957 (suggesting “[s]elf-reflection becomes habitual, and ongoing, and is related to [] growth in a lawyer’s professionalism”).

27. Jane Uygur et al., *A Best Evidence in Medical Education Systematic Review to Determine the Most Effective Teaching Methods That Develop Reflection in Medical Students: BEME Guide No. 51*, 41 MED. TCHR. 3, 4 (2019).

28. *Id.*

29. *See id.* (“Evidence for the use of reflection is increasing and reflection is now considered by many to be an essential aspect of lifelong learning.”); *see also* Hedy S. Wald et al., *Fostering and Evaluating Reflective Capacity in Medical Education: Developing the REFLECT Rubric for Assessing Reflective Writing*, 87 ACAD. MED. 41, 41 (2012) (“Development of reflective capacity has been highlighted as necessary for effective use of feedback in medical education and is an essential aspect of self-regulated and lifelong learning.” (footnote omitted)).

III. MEDICAL EDUCATION'S EXPERIENCE TO BUILD FRAMEWORK OF OBSERVABLE ACTIVITY ON THE SKILL OF REFLECTION

In the last few decades, patients mattered again; medical education became heavily indexed on “patient-centered care in the delivery and improvement of health care services.”³⁰ In addition, an increased emphasis on learner-centered and learner-driven medical educations—focused on the student’s demonstration of the full range of competencies that a graduate needs to provide patient centered care—has taken shape.³¹ Medical educators adopted competency-based medical education (CBME) to guide this change.³² CBME is defined as “an outcomes-based approach to the design, implementation, assessment and evaluation of medical education programs, using an organizing framework of competencies.”³³ A competency, in this regard, is understood as the fundamental group of abilities necessary for an individual to perform their job.³⁴

Medical educators use the term “Milestones” to describe narrative models of how student development of a core competency travels through stages toward a level of competency necessary for a licensed physician to serve clients adequately.³⁵ The Milestones on a specific competency provide a “shared [mental] model” of professional development starting as a student,

30. Robert Englander et al., *Coproducing Health Professions Education: A Prerequisite to Coproducing Health Care Services?*, 95 ACAD. MED. 1006, 1007–08 (2020).

31. *Id.*

32. *Id.* at 1008 (“In health professions education, a new focus on competency . . . based education has challenged the notion of a one-size-fits-all curriculum. Newer calls to ‘standardize the outcomes and individualize the learning pathways’ have the potential to empower learners.”).

33. CELESTE ENO ET AL., MILESTONES GUIDEBOOK FOR RESIDENTS AND FELLOWS 2 (2020) [hereinafter MILESTONE GUIDEBOOK] (quoting Jason R. Frank et al., *Competency-Based Medical Education: Theory to Practice*, 32 MED. TCHR. 638, 641 (2010)).

34. For instance, “all future doctors must have a basic level of knowledge and ability to provide patient care. Without these critical skills, one could not perform their job.” *Id.*

35. See Eric Holmboe & Robert Englander, *What Can the Legal Profession Learn from the Medical Profession About the Next Steps?*, 14 UNIV. ST. THOMAS L.J. 345, 350 (2018) (“Milestones describe what a trajectory should look like so that learners can track their own progress toward an outcome, and help programs recognize advanced students or those who need extra help.”); see also Laura Edgar et al., *Milestones 2.0: A Step Forward*, 10 J. GRAD. MED. EDUC. 367, 367 (2018) (“Milestones are used in resident and fellow outcomes-based assessment based on the 6 general competencies: medical knowledge (MK), patient care (PC), interpersonal and communication skills (ICS), practice-based learning and improvement (PBLI), professionalism (PROF), and systems-based practice (SBP).”).

progressing to competent practitioner and, beyond, to mastery.³⁶ A Milestone Model defines a logical learning trajectory of professional development, and in addition, highlights and makes significant points transparent in student development through use of a narrative that describes demonstrated student behavior at each stage.³⁷ Milestones are particularly useful as they can be used for formative and summative assessment,³⁸ as well as program assessment. If faculty and staff adopt a Milestone Model for a particular competency, they are also implicitly building consensus on what competent performance looks like, giving way to interrater reliability of assessments. Because Milestones describe what a trajectory *should* look like, learners are able to track their own progress toward becoming competent at a particular competency and programs are able to recognize students who are advancing well or in need of added assistance.³⁹

A Milestone Model, first articulated by the Dreyfus brothers, builds on a developmental framework of growth from novice level skill toward expert level skill.⁴⁰ Figure 1 shows this progression.

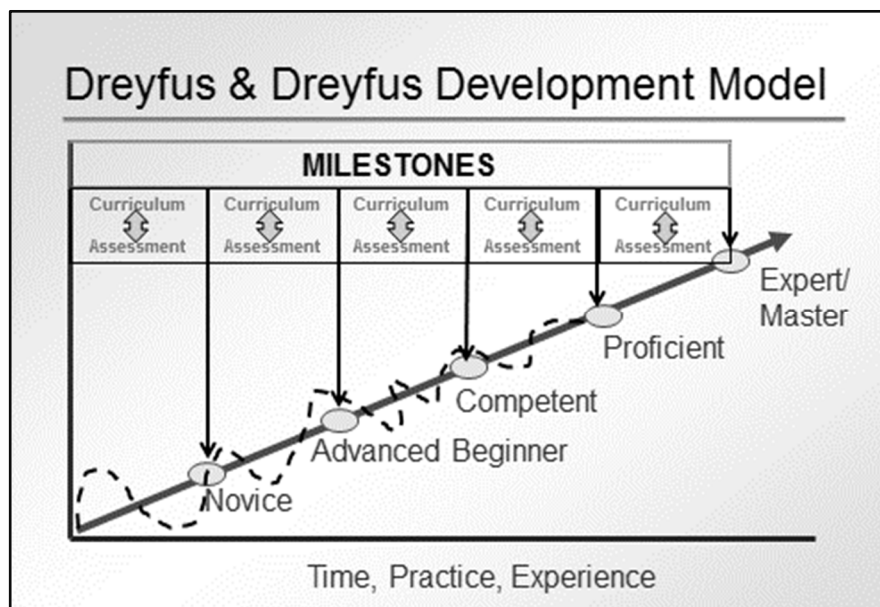
36. *Id.*

37. *Id.* at 367–69.

38. Catherine Garrison & Michael Ehringhaus, *Formative and Summative Assessments in the Classroom*, AMLE, <https://www.amle.org/formative-and-summative-assessments-in-the-classroom/> [<https://perma.cc/JS6H-PNRJ>]. The terms “summative” and “formative,” while different in their application, appear to have become conflated in recent years. An understanding of the two terms is imperative as, in order for an assessment to be balanced, each type of system is integral. “Summative Assessments are given periodically to determine at a particular point in time what students know and do not know,” while Formative Assessments, part of the instructional process, “provide[] the information needed to adjust teaching and learning while they are happening.” *Id.*

39. Holmboe & Englander, *supra* note 35, at 345–46, 350.

40. *Id.* at 351.

FIGURE 1⁴¹

The Milestone Model for Reflective Practice and Commitment to Personal Growth (illustrated in Table 1 below)—developed by The Accreditation Council for Graduate Medical Education (ACGME)—demonstrates one approach to a Dreyfus Model for reflection.⁴²

41. See Neil Hamilton, *What Can We Learn From Medical Field's Experience With Competency-Based Education?*, LEGAL EVOLUTION (July 19, 2020), <https://www.legalevolution.org/2020/07/what-can-we-learn-from-medical-fields-experience-with-competency-based-education-181/> [https://perma.cc/E8DP-PTW7] (plotting an individual's evolution through a series of five progressions: novice, advanced beginner, competent, proficient, and expert); see also HUBERT L. DREYFUS & STUART E. DREYFUS, *MIND OVER MACHINE: THE POWER OF HUMAN INTUITION AND EXPERTISE IN THE ERA OF THE COMPUTER* 110 (1986), reprinted in Paul Batalden et al., *General Competencies and Accreditation In Graduate Medical Education*, 21 HEALTH AFF. (Millwood) 103, 106–107 (2002) (identifying a “similar process of development in the chess player, the adult learning a second language, the adult learning to drive an automobile, and many others”). Figure adapted with permission from E. Holmboe, ACGME.

42. Arthur T. Ollendorff et al., *Harmonizing the Practice-Based Learning and Improvement Milestones*, <https://www.acgme.org/globalassets/PDFs/Milestones/HarmonizingPBLI.pdf?ver=2018-12-06-1403&ver=2018-12-06-1403> [perma.cc/HWK9-ZPNB].

TABLE 1⁴³

Reflective Practice and Commitment to Personal Growth				
Level 1	Level 2	Level 3	Level 4	Level 5
Accepts responsibility for personal and professional development by establishing goals	Demonstrates openness to performance data (feedback and other input) in order to inform goals	Seeks performance data episodically, with adaptability and humility	Intentionally seeks performance data consistently with adaptability and humility	Role models consistently seeking performance data with adaptability and humility
Identifies the facts which contribute to gap(s) between expectation and actual performance	Analyzes and reflects on the factors which contribute to gap(s) between expectations and actual performance	Analyzes, reflects on, and institutes behavioral change(s) to narrow the gap(s) between expectations and actual performance	Challenges assumptions and considers alternatives in narrowing the gap(s) between expectations and actual performance	Coaches others on reflective practice
Actively seeks opportunities to improve	Designs and implements a learning plan, with prompting	Independently creates and implements a learning plan	Uses performance data to measure the effectiveness of the learning plan and when necessary, improves it	Facilitates the design and implementing learning plans for others

43. Emily Fondahn et al., *Assessing for Practice-Based Learning and Improvement: Distinguishing Evidence-Based Practice from Reflective Learning*, 13 J. GRAD. MED. EDUC. 86, 88 (2021).

The creation of a Milestone Model established upon the foundational building block competence, like the skill of reflection, breeds clear benefits for major stakeholders in legal education.⁴⁴ Table 2 below outlines the benefits.

TABLE 2⁴⁵

THE PURPOSE AND BENEFITS OF A MILESTONE MODEL ON REFLECTION

Constituency or Stakeholder	Purpose/Function
[Law Students]	<ul style="list-style-type: none"> • Provide a descriptive roadmap [to foster development toward later stages (new entrant students do not know what they do not know and need to be shown later stages)] • Increased transparency of performance requirements • Encourage informed self-assessment and self-directed learning • Facilitate better feedback to the [student] • Guide personal action plans for improvement

44. MILESTONE GUIDEBOOK, *supra* note 33, at 7.

45. *Id.* Table 2 adapted from ACGME where under the *Constituency or Stakeholder* column we replaced residents, fellowship, fellowship programs, and ACGME with law students, law schools, faculty, and staff, and ABA accreditation and the public. *Id.*

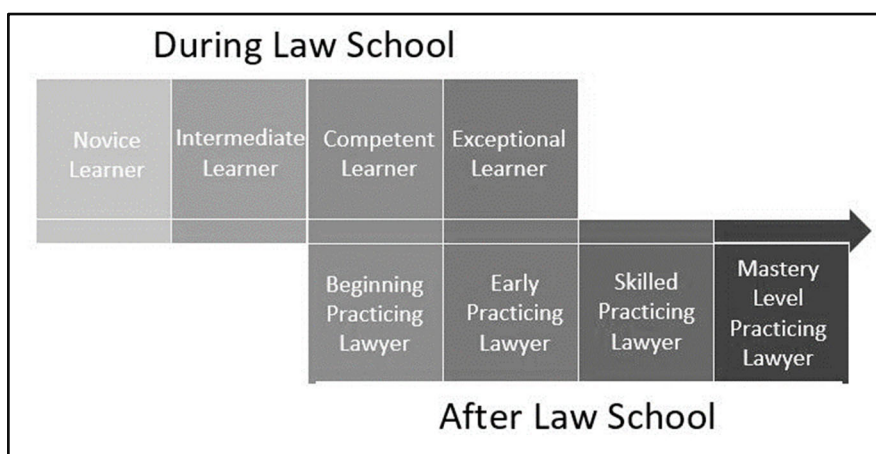
[Law Schools, Faculty, and Staff]	<ul style="list-style-type: none"> • Provide a meaningful framework . . . [or] . . . shared mental model of [student development] . . . • Guide curriculum and assessment tool development • Provide more explicit expectations of [students] . . . • Support better systems of assessment • Enhance opportunity for early identification of under-performers so as to support early intervention
[ABA Accreditation and the Public]	<ul style="list-style-type: none"> • Accreditation—enable continuous monitoring of programs and lengthening of site visit cycles • Public Accountability—report at an aggregated national level on competency outcomes • Community of practice for evaluation and research, with a focus on continuous improvement

While legal educators may assume that faculty and staff, teaching the traditional legal skills that all law schools emphasize (the Standard 302 (a), (b), and (c) skills),⁴⁶ have a reasonably common understanding of the definition of these traditional skills and the stages of development associated with each, we cannot assume this with respect to a skill like reflection. For the sake of our students, it is imperative that the faculty and staff work together toward a reasonably common understanding of the skill of reflection and the stages of student development related to such a skill.

The next step toward a Milestone Model on reflection is to embrace the idea that a student begins the development of these same competencies well into professional life after law school. The idea is depicted in Figure 2 below, which shows the competency alignment model that the Holloran Center has developed.

46. ABA, STANDARDS & RULES OF PROCEDURE FOR APPROVAL OF LAW SCHOOLS 2021–2022 5, 17 (2021) (providing a standard program for legal education).

FIGURE 2
 HOLLORAN COMPETENCY ALIGNMENT MODEL
 SHOWING THE STAGES OF DEVELOPMENT OF LEARNING OUTCOME
 COMPETENCIES: A CONTINUUM FROM ENTRY INTO LAW SCHOOL
 THROUGHOUT A CAREER⁴⁷



In simplest terms, a Milestone Model for a particular competency details what it means for the student or lawyer to be “at” the various respective stages of development depicted in Figure 2.

From this point on, devising a Milestone Model largely depends upon the particular competency, what progressive development toward mastery of the particular competency entails, and how the student’s progress through stages can be fostered, evidenced, and assessed. With stages carefully identified, the school can better consider how a student’s movement from stage to stage can be supported with experiences, coaching, reflection, and assessment.

47. This continuum or alignment model, developed by Neil Hamilton and Jerry Organ, builds on the Dreyfus and Dreyfus Model of development from novice to expert. *See generally* Stuart E. Dreyfus, *The Five-Stage Model of Adult Skill Acquisition*, 24 BULL. SCIENCE, TECH. & SOC. 177, 177–81 (2004) (describing, in detail, the original model of acquisition adapted by Hamilton & Organ presented here). In the model depicted in Figure 2, a “competent learner” is ready to take the bar examination and begin the practice of law after passing the exam.

Note that the Milestone Model on a skill like reflection should be aligned with the models that legal employers use to assess their lawyers on the same competency. The school's learning outcomes and curriculum thus will meet employer and client needs allowing students communicate their value to potential employers using the employers' language.

IV. A MILESTONE MODEL ON THE SKILL OF REFLECTION

A Milestone Model on the skill of reflection requires a clear definition of "reflection" and the sub-competencies of reflection, plus the stages of development on each of the sub-competencies. Defining reflection and its sub-competencies is challenging because it is a complex construct with a lack of consensus on its definition.⁴⁸ The strongest definition in a professional context comes from medical education in a paper authored by Dr. Quoc Nguyen and others.⁴⁹ It is helpful to introduce that definition here to illustrate how to embark upon thinking about supporting reflection and self-assessment. Based on a systematic review of the most cited medical education papers on reflection in the period 2008 to 2012, the authors defined reflection as "the process of engaging the self in attentive, critical, exploratory and iterative interactions with one's thoughts and actions, and their underlying conceptual frame, with a view to changing them . . ." ⁵⁰ This conceptual model of reflection has two extrinsic elements⁵¹ and four core sub-competencies.⁵² The first extrinsic element is an experience that triggers a reflective thinking process,⁵³ and the second, the timing of the

48. Jane Uygur et al., *supra* note 27, at 3.

49. *See id.* (highlighting the Nguyen study in recognition of its influence).

50. Quoc Dinh Nguyen et al., *What is Reflection? A Conceptual Analysis of Major Definitions and a Proposal for a Five-Component Model*, 48 MED. EDUC. IN REV. 1176, 1182 (2014).

51. *See id.* at 1184 (exploring elements that "alter *instances* of reflective thinking processes, but do not alter thinking processes to make them reflective *per se*").

52. *See id.* at 1180. Nguyen include a fifth core sub-competency called "[h]aving a view on the change" itself, which picks up the continuing process of how an envisioned change can be changed further with a continuing process of reflection. *Id.* at 1182. To keep the model proposed here simpler, this fifth sub-competency is not included.

53. *Id.* at 1184.

reflection.⁵⁴ In the vast majority of definitions of reflection, the timing occurs after the experience, but Nguyen and co-authors argue this is not enough—they believe, reflection should occur before, during, and after the experience.⁵⁵

The four core sub-competencies (or steps) of a reflective thinking process are (1) to identify specific thoughts and actions the person is thinking about, (2) to think about the thoughts and actions attentively and critically, in an exploratory and iterative fashion, (3) to become aware of “the conscious or unconscious conceptual framework[(s)] that underlie[] [the person’s] thoughts and actions,” and (4) to have a purpose of changing the self in terms of the person’s conscious or unconscious conceptual framework.⁵⁶ The curriculum should provide multiple opportunities for students to develop the habit of engaging in this reflective thinking process.⁵⁷

The reflection sub-competencies that Nguyen et al. identified from their systematic review of medical education scholarship on reflection have significant similarities to the reflective essay/journal rubric that Balsam, Brooks, and Reuters created for law student work.⁵⁸ The Balsam/Brooks/Reuters rubric is based on their experience teaching law students the skill of reflection and feedback on the rubric from colleagues and workshop attendees.⁵⁹ Both models include the sub-competencies of (1) clearly identifying the topic, (2) “address[ing] multiple perspectives[] including the writer’s own perspective,” and (3) articulating insights gained and action steps going forward.⁶⁰ This convergence supports the content validity of these sub-competencies.⁶¹

54. *Id.*

55. *Id.*

56. *Id.* at 1181–82.

57. See Neil Hamilton, *Professional Identity/Professional Formation/Professionalism Learning Outcomes: What Can We Learn About Assessment from Medical Education?*, 14 U. ST. THOMAS L.J. 357, 381 (2018) (describing the importance of self-reflection in the legal education system).

58. Balsam et al., *supra* note 1, at 70.

59. *Id.* at 53, 58.

60. *Id.* at 58–59.

61. See Doris McGartland Rubio et al., *Objectifying Content Validity: Conducting a Content Validity Study in Social Work Research*, 27 SOC. WORK RSCH. 94, 95 (2003) (discussing the formation of construct validity).

The Balsam/Brooks/Reuters rubric additionally includes a sub-competency on “personal engagement” where the student’s written reflection shows “deep analytical self-reflection,” “meaningful personal reaction or struggle on the intellectual-cognitive level and the emotional level,” and “self-awareness and [the] writer’s assessment of his/her strengths and weaknesses”⁶² Nguyen et al. frame this sub-competency in different terms as showing awareness of the student’s conscious and unconscious conceptual framework(s) that underlie the student’s thoughts and actions.⁶³ The Author prefers the Nguyen et al. framing of this sub-competency because it calls on the student to clarify the student’s conceptual framework which is a clearer task than “deep analytical self-reflection” and “meaningful personal reaction or struggle” or “self-awareness.”⁶⁴ Identifying the student’s strengths and weaknesses can be included in the next sub-competency of considering changes in the student’s conceptual framework.

This sub-competency of showing awareness of the student’s conscious and unconscious conceptual framework(s) that underlie the student’s thoughts and actions is a difficult but important step in a person’s moral development. By the author’s own experience, many students have difficulty with this sub-competency because most adults/instructors themselves have never been asked to articulate the conceptual frameworks that underlie their thoughts and actions, so a written expression is inchoate (and implicit). The footnote in the Milestone Model on reflection in Table 3 below gives examples to help the student think through this challenge. To give even more guidance, the instructor should consider providing students with examples of novice, intermediate, competent, and exceptional reflection responses to each reflection assignment (see Table 4 below).

Table 3 is a Milestone Model on the skill of reflection that incorporates the sub-competencies that Nguyen et al. identified.⁶⁵

62. Balsam et al., *supra* note 1, at 70.

63. Nguyen et al., *supra* note 50, at 1182.

64. Balsam et al., *supra* note 1, at 70.

65. Nguyen et al., *supra* note 50, at 1180.

TABLE 3

ASSESSMENT OF A STUDENT'S SKILL OF REFLECTION BASED ON A NUMBER OF EXPERIENCES WHERE THE STUDENT DEMONSTRATED THE SKILL

The skill of reflection is an ongoing cycle of careful examination of specific thoughts and actions from a student's own perspective and the perspective of others with a goal of informing and improving the student's insight and practice in future experiences.⁶⁶ This Milestone can be used to assess a student's overall skill of reflection over time based on, for example, a portfolio of individual reflection writing assignments.

Subcompetencies of Reflection	Novice Learner (Level 1)	Intermediate Learner (Level 2)	Competent Learner (Level 3)	Exceptional Learner (Level 4)
1. In every reflection, the student identifies the specific thoughts and actions the student is examining relevant to the assignment.	RARELY identifies specific thoughts and actions the student is examining.	SOMETIMES identifies the specific thoughts and actions the student is examining.	OFTEN identifies the specific thoughts and actions the student is examining.	CONSISTENTLY identifies the specific thoughts and actions the student is examining.

66. See *id.* at 1189; see also Lawrence Grierson et al., *The Reliability Characteristics of the REFLECT Rubric for Assessing Reflective Capacity Through Expressive Writing Assignments: A Replication Study*, 9 PERSP. MED. EDUC. 281, 281 (2020) ("Reflection is a metacognitive activity that involves thinking intentionally about performance before, during, or after situations with the aim of detecting and characterizing the mental models that underpin the decisions and actions relevant to the performance outcome."); see also Tony Marshall, *The Concept of Reflection: A Systematic Review and Thematic Synthesis Across Professional Contexts*, 20 REFLECTIVE PRAC. 396, 411 (2019) ("Reflection is a careful examination and bringing together of ideas to create new insight through ongoing cycles of expression and re/evaluation."). Lindsey Gustafson made very useful suggestions on an earlier draft of this Milestone Model. Melissa Berry, Leah Jackson Teague, Elizabeth Ewert, Yurixhi Gallardo Martinez, Arturo Thomson, Gail Silverstein, and Alex Sklut also made useful suggestions on an earlier draft of this Model.

2. The student carefully examines specific thoughts and actions from the student's own perspective and the perspective of others. ⁶⁷	RARELY carefully examines specific thoughts and actions from the student's own perspective and the perspectives of others.	SOMETIMES carefully examines specific thoughts and actions from the student's own perspective and the perspectives of others.	OFTEN carefully examines specific thoughts and actions from the student's own perspective and the perspectives of others.	CONSISTENTLY carefully examines specific thoughts and actions from the student's own perspective and the perspectives of others.
3. Shows awareness of the student's own conceptual framework(s) (e.g., the motivations, intentions, beliefs, premises, and values) that underlie the thoughts and actions. ⁶⁸	RARELY shows awareness of the student's own conceptual framework that underlies the thoughts and actions.	SOMETIMES shows awareness of the student's own conceptual framework that underlies the thoughts and actions.	OFTEN shows awareness of the student's own conceptual framework that underlies the thoughts and actions.	CONSISTENTLY shows awareness of the student's own conceptual framework that underlies the thoughts and actions.

67. Note there are three measurables here (1) the student's perspective, (2) the perspectives of others, and (3) careful examination of both.

68. For example, is the conceptual framework principally motivating the student's thoughts and actions focused on rule compliance, rewards and recognition, compliance with social norms and expectations, internal values, or awareness of gaps in student's current conceptual framework? This is based on constructive-developmental theory. *See generally* Hamilton & Monson, *supra* note 25, at 937 ("The fundamental premise of constructive developmental theory is that adults can become increasingly self-aware of both egocentric views and hidden assumptions that might block our attempts to change, hamper our ability to empathize with others, or limit our potential effectively to lead others from an internalized, authentic source of authority.").

4. Considers changes in terms of the student's conceptual framework.⁶⁹	RARELY considers changes in terms of the student's conceptual framework.	SOMETIMES considers changes and outlines specific steps in terms of the student's conceptual framework.	OFTEN considers changes and outlines specific steps in terms of the student's conceptual framework.	CONSISTENTLY considers changes and outlines specific steps in terms of the student's conceptual framework.
5. Engages in the above steps iteratively over time.	RARELY engages in the above steps iteratively over time.	SOMETIMES engages in the above steps iteratively over time.	OFTEN engages in the above steps iteratively over time.	CONSISTENTLY engages in the above steps iteratively over time.

Since the Milestone Model on the skill of reflection in Table 3 above is based on an observation of a number of assignments where the student is demonstrating reflection, an instructor will need a grading rubric for each individual assignment. Such grading rubric is presented in the next section of this paper.

V. A GRADING RUBRIC FOR INDIVIDUAL REFLECTION WRITING ASSIGNMENTS

Building off the Milestone Model in Table 3 on the overall skill of reflection, the author created a grading rubric for individual reflective writing assignments set forth in Table 4 below. Table 3 presents a Milestone Model on the Assessment of a Student's Skill of Reflection Based on a Number of Experiences Where the Student Demonstrated the Skill. In order for an instructor to effectively assess a student's stage of development on the Milestone Model in Table 3, the instructor needs a data set including several individual reflective writing assignments using the grading rubric in Table 4. Ideally with respect to a skill like reflection, each student has the responsibility of developing a portfolio of individual reflective writing assignment rubrics using Table 4 that together provide reasonable evidence

69. In making such an examination, the student should include some consideration of the student's strengths and weaknesses with respect to specific action steps to change the student's conceptual framework.

that the student has grown to achieve “competent learner” with respect to the Milestone Model on reflection presented in Table 3.

TABLE 4
REFLECTION WRITING ASSIGNMENT GRADING TEMPLATE⁷⁰

* The instructor should first look over the Milestone Model on Assessment of a Student’s Skill of Reflection to understand the stages of development for this competency. This grading template is for individual assignments. Note that the instructor must fill in the points to be given for each level of performance on each sub-competency depending on the total points available for the assignment. Note also that the instructor may wish to include points relating to the quality of the student’s writing.

Course Name:

Assignment Name:

[For the instructor to put into the assignment.] Explain briefly the experience(s) that are the subject for this reflection assignment.

[For the instructor to put into the assignment.] List the multiple perspectives that the instructor wants the student to consider with respect to the experience(s) that are the topic of the reflective writing assignment. E.g., readings, class discussion, interviews, client meeting, team discussion, student research, etc.

70. This grading template adopts the four sub-competencies of a reflective thinking process defined by Quoc D. Nguyen et al. based on a systematic review of medical education scholarship. Nguyen et al., *supra* note 50, at 1180. The template also adapts some language in the descriptions of the novice, intermediate, competent, and exceptional learner stages from Georgia State Professor Kendall Kerew’s Reflection Rubric and the AAC&U VALUE Rubric on the Foundations and Skills for Lifelong Learning. Neil W. Hamilton, *Fostering Student Growth Toward Later Stages of Self-Directed/ Self-Regulated Learning and Bar Success*, 3 RAISING THE BAR (RSB), Summer 2020, at 8 n.11; *Foundations and Skills for Lifelong Learning VALUE Rubric*, AACU, <https://www.aacu.org/value/rubrics/lifelong-learning> [https://perma.cc/2J6C-K99L].

Sub-competencies of Reflection	Novice Learner (Level 1)	Intermediate Learner (Level 2)	Competent Learner (Level 3)	Exceptional Learner (Level 4)
<p>1. Identifies the specific thoughts and actions the student is examining with respect to the experience(s) above.</p>	<p>Provides no narrative explaining the specific thoughts and actions the student is examining in the context of the experience(s) in the assignment.</p>	<p>Provides a cursory narrative explaining the specific thoughts and actions the student is examining in the context of the experience(s) in the assignment.</p>	<p>Provides a general narrative explaining the specific thoughts and actions the student is examining in the context of the experience(s) in the assignment.</p>	<p>Provides a thorough narrative explaining the specific thoughts and actions the student is examining in the context of the experience(s) in the assignment.</p>
<p>2. From the perspectives that the instructor has identified including the student's own perspective, the student carefully examines the specific thoughts and actions.</p>	<p>Examines the experience(s) only from the student's own perspective.</p>	<p>Examines the experience(s) largely from the student's own perspective and only considers additional perspectives the instructor has identified in a superficial manner.</p>	<p>Examines the experience(s) from multiple perspectives identified by the instructor, including a personal perspective, but fails to identify and examine one or more of the other important perspectives in a meaningful way.</p>	<p>Examines the experience(s) from multiple perspectives identified by the instructor, including a personal perspective, in a meaningful way.</p>

<p>3. Student shows awareness of the conceptual framework(s) (e.g., the motivations, intentions, beliefs, premises, and values) that underlie the student's thoughts and actions.⁷¹</p>	<p>Shows just surface-level awareness of the student's own conceptual framework underlying the student's thoughts and actions.</p>	<p>Shows some depth in awareness of the student's own conceptual framework underlying the student's thoughts and actions.</p>	<p>Shows significant depth in awareness of the student's own conceptual framework underlying the student's thoughts and actions.</p>	<p>Shows deep awareness of the student's own conceptual framework underlying the student's thoughts and actions.</p>
<p>4. Student considers changes in the student's conceptual framework that lead to an action step(s).</p>	<p>Focuses only on the past with no indication how insights gained might both change student's conceptual framework and lead to an action step.</p>	<p>Provides some consideration of how insights gained might change student's conceptual framework and lead to an action step. Good definition of an action step.</p>	<p>Provides good consideration of how insights gained might change student's conceptual framework and lead to an action step. Excellent definition of an action step.</p>	<p>Provides in-depth consideration of how insights gained might change student's conceptual framework and lead to an action step. Outstanding definition of an action step.</p>

71. For example, is the conceptual framework principally motivating the student's thoughts and actions focused on rule compliance, rewards and recognition, compliance with social norms and expectations, internal values, or awareness of gaps in student's current conceptual framework? This is based on constructive-developmental theory. *See generally* Hamilton & Monson, *supra* note 25, at 937 ("The fundamental premise of constructive developmental theory is that adults can become increasingly self-aware of both egocentric views and hidden assumptions that might block our attempts to change, hamper our ability to empathize with others, or limit our potential effectively to lead others from an internalized, authentic source of authority.").

The combination of the Milestone Model on reflection in Table 3 and the Reflection Writing Assignment Grading Template in Table 4 should help instructors with the problem that Uygur et al. identified where “many educators were using reflection without teaching students how to reflect Significantly, there were numerous studies in which students were assessed on their ability to reflect with no intervention to teach or facilitate reflection.”⁷² Uygur et al. continues: “The review findings indicate that it is important for students to receive some assistance in navigating the complexity of reflection and that they benefit from learning about reflections through introductions, guidelines to writing, and by receiving feedback on their work.”⁷³

The next section explores guided reflection at key transition points for each law student using a coaching model as the most effective curriculum to foster each student’s growth to the next level on the skill of reflection.

VI. GUIDED REFLECTION AT KEY TRANSITION POINTS WITH A COACH

As should be clear from the discussion in Parts IV and V, a student could do several individual reflection assignments and receive feedback on them where each instructor uses the Reflective Writing Assignment Grading Template in Table 4. If the individual reflective writing assignments are done for several different instructors, a student may not effectively receive feedback on whether the student is growing to the next level on the overall skill of reflection indicated in Table 3.

Over time, a law school could move toward a continuous mentor/coach model where a trained mentor/coach, particularly at the major transition points in a student’s law school experience, is able to see all of a student’s individual reflection writing assignment grading templates and provide overall guidance to a student on this skill. Students benefit greatly from this type of individualized coaching to guide this reflective thinking process. The findings of a meta-study of empirical research on teaching interactions in medical education emphasizes that “it is important for students to receive some assistance in navigating the complexity of reflection and that [students] benefit from learning about reflection through introductions, guidelines to writing, and by receiving feedback on their work.”⁷⁴ The literature also points to the role of a mentor/coach as essential for

72. Uygur et al., *supra* note 27, at 13.

73. *Id.*

74. *Id.*

scaffolding medical students' reflections.⁷⁵ This is a model of providing continuous coaching using guided reflection at major transition points for each student.⁷⁶

The major transitions a student experiences when the student is actually doing the work of a lawyer are particularly important times for guided reflection. A 2018 meta-analysis reviewed seventy articles on medical transitions to synthesize the evidence and provide guidance for medical education.⁷⁷ The strongest recommendation (based on a large and consistent body of evidence) was the following:

1. Provide authentic (real-life or *mimicking* real-life) and meaningful learning opportunities at transitions in an effort to build progressively toward an understanding of principles. Such authenticity of the learning becomes increasingly important as the learners become more independent.⁷⁸

Moderate to strong recommendations (based on solid evidence from one or more papers plus the consensus of the article authors) were as follows:

2. Encourage progressive, incremental independence through a sliding scale of decreasing supervision by instructors coupled with a demonstration of increasing trust in the student;⁷⁹
3. Emphasize to students “the psychological impact of actual responsibility[,] including the process of their own” professional formation, as they advance to each subsequent level of training;⁸⁰
4. Launch “a mentorship program with local champions”—i.e., “supervisors capable of giving effective feedback, articulat[ing] expectations clearly, and function[ing] as good role models”—to develop learners' competence and confidence (supported reflection

75. Salah E. Kassab et al., *Construct Validity of an Instrument for Assessment of Reflective Writing-Based Portfolios of Medical Students*, 11 ADV. MED. EDUC. PRACT. 397, 399 (2020).

76. Neil Hamilton, *Mentor/Coach: The Most Effective Curriculum to Foster Each Student's Professional Development and Formation*, 17 U. ST. THOMAS L.J. 1, 12 (forthcoming 2021) (available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3747309).

77. *See generally* Sarah Yardley et al., *The Do's, Don't and Don't Knows of Supporting Transition to More Independent Practice*, 7 PERSP. MED. EDUC. 8, 8 (2018).

78. *Id.* at 12–14.

79. *Id.* at 15–16.

80. *Id.* at 16.

and discussion are important in the process of becoming an independent practitioner);⁸¹ and

5. Assist in the “development of resilience and independence.”⁸²

The author's own study of how 2Ls early in the fall semester assess the major transitions of the 1L year and the following summer supports the importance of professionally authentic experiences.⁸³ The 2L students, reflecting on these major transitions, rate professionally authentic experiences (i.e., real-life, or mimicking real-life, work of a lawyer) as having the greatest impact on their growth toward later stages of ownership of their own continuous professional development.⁸⁴ For example, a very high proportion of students rated paid or unpaid summer employment (generally) (52%) and a single impactful experience over the course of summer employment (specifically) (59%) as having a great influence on their transition from thinking and acting like a student to thinking and acting like a junior lawyer.⁸⁵ Next, the third most impactful experience students rated was receiving back their first graded memorandum (19%), and the fourth was professionally authentic experiences in mentor externship⁸⁶ (19%).⁸⁷

The curriculum should provide multiple opportunities for guided reflection with a coach at key transitions involving professionally authentic experiences with feedback to each student. A coach can orient itself to where each student is developing and engage the student at the student's current corresponding developmental stage to mature to the next stage of the skill of reflection. Note also that if a school has an institutional learning outcome including reflection or self-evaluation, the observations of a coach about a student's stage of development on a Milestone Model like Table 3 is a “direct measure” that satisfies ABA Accreditation Standard 315 on

81. *Id.* at 17.

82. *Id.*

83. Neil Hamilton, *The Major Transitions in Professional Formation and Development from Being a Student to Being a Lawyer Present Opportunities to Benefit the Students and the Law School*, 73 BAYLOR L. REV. 139, 153 (2021).

84. *Id.* at 153–54.

85. *Id.* at 153.

86. *Id.* at 154. The University of St. Thomas School of Law requires students to participate in a Mentor Externship in which each student has an assigned mentor in the practicing bar for each year of law school. *Mentor Externship Program*, U. ST. THOMAS, <https://www.stthomas.edu/law/practical-training/mentor/> [https://perma.cc/DAM2-GVVN].

87. Hamilton, *supra* note 83, at 153–54.

evaluation of the program of legal education, learning outcomes, and assessment methods.⁸⁸

VII. CONCLUSION

Reflection is an important skill for each student—with benefits for the student, the faculty, staff, and law school in terms of each student’s growth and performance. For example, reflection is a key sub-competency of self-directed/self-regulated learning.⁸⁹ A student’s growth to a later stage of self-direction improves academic performance, bar passage probabilities, and post-graduation employment outcomes.⁹⁰

The author’s experience is that the benefits of growing to a later stage of the skill of reflection may not be obvious to all the learners. Some hold, essentially, that reflection as a skill is in the category of “fuzzy-wuzzy baloney,” and similarly, others, that they have never liked “noodling” and they don’t want to be forced to “noodle.” Finally, some think that reflection simply cannot be taught or assessed.

There is no question that serious inquiry into both the perspectives of other people and one’s own conscious and unconscious conceptual framework is challenging and can lead to uncomfortable cognitive dissonance during the process of growing to the next level. An instructor or coach that values the art of reflection has the ability to guide the reflective process by emphasizing the benefits of reflection analyzed in Part II earlier and can help each student with appropriate questions and guidance, so the reflective process is not overwhelming. In addition, in a classroom setting, the instructor can bring in successful alumni practitioners who are five to ten years out of law school who can validate the importance of the skill of reflection for professional growth and success. For example, larger firms require each associate to do regular professional self-assessments where reflection is foundational for professional growth and success.

88. Current Standard 315 provides: “The dean and the faculty of a law school shall conduct ongoing evaluation of the law school’s program of legal education, learning outcomes, and assessment methods; and shall use the results of this evaluation to determine the degree of student attainment of competency in the learning outcomes and to make appropriate changes to improve the curriculum.” 2021–2022 STANDARDS, Standard 315, *supra* note 7, at 25.

89. The Holloran Center has developed a Milestone Model on Self-Directedness. School of Law: Holloran Center, *Assessment of Student’s Ownership of Continuous Professional Development (Self-Directedness)*, U. ST. THOMAS, <https://www.stthomas.edu/media/hollorancenter/pdf/Revisedself-directednessrubricDecember2019.pdf> [<https://perma.cc/HC98-EVEU>].

90. See HAMILTON & BILIONIS, *supra* note 8, at 11.

Note that an important task for instructors, in the author's experience, is to model reflection in the instructor's own practice by making the instructor's reflective activities explicit. In other words, "ante up," from the get-go, sharing some vulnerability that demonstrate reflection on past setbacks, mistakes, and difficult experiences. In the author's experience, it is possible, with a variety of strategies, to convince nearly all students of the benefits of growing to a later stage with respect to the skill of reflection. There is a small subset of students who are at a "not yet" stage with respect to the skill of reflection, but the author has had a number of those (now) alumni call at a later time in their career to discuss their change of mind. Fostering reflection with law students requires an optimistic and hopeful frame of mind.