

MULTIJURISDICTIONAL PRACTICE IN THE U.S.: IN-HOUSE COUNSEL PRO BONO

Multijurisdictional practice rules pose a significant obstacle for many in-house attorneys participating in pro bono activities. Numerous in-house attorneys, though admitted and in good standing in one or more U.S. jurisdictions, are not licensed in the states in which they currently work. The practice rules in all but one state permit in-house counsel licensed in other U.S. jurisdictions to represent their in-state employer, either through a registration or certification process or without registration in some jurisdictions, pursuant to an exception in the rule of professional conduct governing the unauthorized practice of law. However, many of these rules limit representation to the employer-client.¹

Some states provide pro bono exemptions, allowing non-locally licensed in-house counsel (“registered in-house counsel”)² to provide pro bono legal services in addition to representation of the employer-client. However, most jurisdictions that permit these lawyers to do pro bono restrict their pro bono practice, mandating that pro bono legal services be provided only in association with an approved organization and/or under the supervision of a locally-licensed lawyer, thereby limiting the flexibility and opportunities for in-house counsel to engage in pro bono work. Other jurisdictions do not expressly permit registered in-house counsel to deliver pro bono legal services.

Over the past two decades, some states have re-evaluated their rules and amended them to reduce or eliminate limitations on in-house pro bono service. Currently, four jurisdictions have adopted provisions that eliminate restrictions and permit registered in-house counsel to engage in pro bono broadly while protecting clients and requiring lawyer competency – Illinois, New York, Virginia³, and Wisconsin.

Growth of In-House Pro Bono

In-house pro bono has grown tremendously over the past 25 years. Many of the Fortune 500 companies and a majority of the Fortune 100 companies have either set up or are moving to establish formal pro bono programs for the lawyers in their legal departments. In addition, lawyers in smaller companies and legal departments engage in pro bono legal services through

¹ In 2002, the American Bar Association (ABA) amended ABA Model Rule 5.5 Unauthorized Practice Of Law; Multijurisdictional Practice Of Law to authorize in-house counsel, licensed and in good standing in at least one U.S. jurisdiction, to practice for their employers without becoming admitted to the local bar and without registering or obtaining certification from the bar or court. Several jurisdictions have adopted the amended model rule. Most others have adopted rules that provide that non-locally licensed in-house counsel may work for their employer, but require them to register or obtain certification to do so. Only one state, Hawaii, provides no exemption for non-locally licensed in-house counsel.

² For simplicity, this paper refers to all non-locally licensed in-house attorneys who practice in a jurisdiction that has adopted Model Rule 5.5 or a similar practice rule as “registered in-house counsel.”

³ Virginia has two categories of registered in-house counsel, Part I Corporate Counsel, who are broadly authorized to do pro bono, and Part II Corporate Counsel Registrants, who are not.

opportunities organized by Corporate Pro Bono (CPBO), ACC chapters, legal service providers, bar associations, law firms, and other organizations.

The pool of registered in-house counsel who may participate in pro bono numbers in the thousands. In the following select jurisdictions, registered in-house counsel authorized to work in state for their employer number:

- 376 in Arizona
- 1,857 in California
- 400 in Delaware
- 1,425 in Florida
- more than 550 in Illinois
- 675 in Massachusetts
- approximately 1,194 in New Jersey
- approximately 1,600 in New York
- 480 in Ohio
- 422 in Pennsylvania
- 2,062 Virginia Corporate Counsel and 1,077 Virginia Corporate Counsel Registrants⁴

Actions to Change Practice Rules

In recent years, there have been efforts to encourage states to change their practice rules so that registered in-house counsel may engage in pro bono services more freely.

State Practice Rules

In-house counsel in Virginia worked to amend Virginia's practice rules to allow non-locally licensed in-house counsel authorized to work for their employer to also provide pro bono services. In 2006, Virginia adopted a rule that allowed its registered in-house counsel to provide pro bono services but only in partnership with an approved organization and under the supervision of a Virginia licensed lawyer among other restrictions. These limitations made pro bono practice impractical for many registered in-house counsel and limited the amount of pro bono provided to those in need in Virginia.

In the spring of 2010, following an access to justice summit hosted by the Virginia Supreme Court, lawyers from the Virginia State Bar, Virginia Bar Association, and the Association of Corporate Counsel worked with CPBO to submit a proposed amendment to the practice rules that the Virginia Supreme Court passed in 2011. Now, registered in-house attorneys may provide pro bono broadly, subject to the Virginia Rules of Professional Conduct.⁵

Other states, including Connecticut, Florida, Iowa, Massachusetts, Minnesota, New Jersey, and Ohio, then made changes to their practice rules that allow for greater in-house pro bono involvement. However, unlike in Virginia, the rules in these jurisdictions impose several restrictions that narrow in-house pro bono engagement and limit the number of clients served.

⁴ Data last verified in July 2024, except for Illinois (last verified in 2022).

⁵ The broad pro bono rule applies to in-house counsel registered as Virginia Corporate Counsel under Part I of Virginia Supreme Court Rule 1A:5; there is no similar provision for in-house Corporate Counsel Registrants under Part II of this Rule.

In April 2013, Illinois, like Virginia, amended its existing registered in-house counsel provision to remove these types of restrictions and permit Illinois registered in-house counsel to provide pro bono broadly. In December 2013, New York adopted a similarly broad rule, and Wisconsin followed suit by removing unnecessary restrictions effective January 2017. Now, four states – Illinois, New York, Virginia, and Wisconsin – have practice rules that permit registered in-house counsel to provide pro bono legal services without unnecessary limitations and while protecting clients and requiring lawyer competency. These provisions serve as [models for other jurisdictions](#).

Conference of Chief Justices

In July 2012, the Conference of Chief Justices (CCJ) passed Resolution 11 “[In Support of Practice Rules Enabling In-House Counsel to Provide Pro Bono Legal Services](#)” asking CCJ members to “consider promoting the expansion of pro bono legal services, including by amending the practice rules to allow non-locally licensed in-house counsel who are permitted to work for their employer to also provide pro bono legal services subject to the local rules of professional conduct.”

Current Status of In-House Pro Bono Exceptions and Rules

In sum, the number of jurisdictions that currently:⁶

- permit in-house counsel who are not locally licensed (“registered in-house counsel”) to work for their employer under an unauthorized practice of law exception: **50**⁷;
- allow registered in-house counsel to engage in pro bono legal services broadly, subject to the local professional rules of conduct: **4**;
- allow registered in-house counsel to provide pro bono legal services, only if “associated with” or “affiliated with” approved legal services organizations **or** under the supervision of a locally licensed attorney: **5**;
- allow registered in-house counsel to provide pro bono legal services, only if “associated with” or “affiliated with” approved legal services organizations: **17**;
- allow registered in-house counsel to provide pro bono legal services, only if “associated with” or “affiliated with” approved legal services organizations **and** under the supervision of a locally licensed attorney: **5**;
- are silent with regard to registered in-house counsel providing pro bono legal services **but** allow out-of-state lawyers, including in-house counsel, to provide pro bono legal services subject to a number of restrictions, which may include “associated with” or “affiliated with” approved legal services organizations, under the supervision of a locally licensed lawyer, and other limitations: **11**; and
- are silent with regard to registered in-house counsel **and** out-of-state lawyers providing pro bono legal services: **9**.

⁶ This summary includes the fifty states and the District of Columbia. It does not include U.S. territories.

⁷ Hawaii is the only state that does not permit non-locally licensed counsel to practice law for a corporate employer.

Options That Do Not Require Local Bar Admission

Out-of-State Attorney Provisions

A number of jurisdictions allow active attorneys in good standing who are licensed out-of-state, including in-house counsel, to provide pro bono. Non-locally licensed in-house counsel in jurisdictions that do not expressly permit their pro bono participation may practice under these provisions. However, some of these rules impose more restrictions than those adopted specifically for in-house counsel, including being “associated with” or “affiliated with” approved legal services organizations and/or working under the supervision of a locally licensed attorney, as well as time limitations (as short as 18 months).

Some jurisdictions intentionally have only one pro bono provision that applies to out-of-state attorneys, including non-locally licensed in-house counsel. For example, effective January 1, 2019, the District of Columbia Court of Appeals eliminated the rule specifically authorizing internal counsel to engage in pro bono and replaced it with a more general rule authorizing out-of-state attorneys to engage in pro bono under certain conditions.

Certain Pro Bono Matters

In-house counsel located in jurisdictions that do not expressly permit their involvement in pro bono may nonetheless be able to perform certain types of pro bono matters. These attorneys will need to focus on pro bono options that do not technically involve the practice of law, including practicing under the close supervision of an attorney licensed within the jurisdiction, or for which admission to the state bar is not otherwise required.

Some examples are:

- Dispute Resolution
- Intake and Screening
- Special Administrative Cases (including, but not limited to: Immigration, IRS, Medicaid, Military Discharge Upgrade, School Board Hearings, Social Security Benefits, Unemployment Insurance, Veterans’ Appeals, Welfare, Special Education)

While these general categories of work may not be considered the practice of law for the purpose of local bar rules, attorneys should consult the rules and counsel in the state in which they wish to do pro bono work. Some states consider the practice of law to include all work performed by a lawyer for a client, and thus, might not agree that this work does not require local admission. Also, be aware that under some policies, to qualify for the protections of malpractice insurance, an attorney must be in a lawyer-client relationship. In these circumstances, if a disgruntled recipient of services decides to sue the attorney, that attorney may not be able to argue that the attorney was not practicing law for purposes of admission, but was practicing for purposes of liability coverage.

Pro hac vice admission is also available to in-house attorneys interested in doing pro bono work on litigation matters but is often a cumbersome and time-consuming process.

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Chart on Rules Governing Pro Bono by Non-Locally Licensed In-House Counsel

Below is a jurisdiction-by-jurisdiction chart of the multijurisdictional practice rules applicable to non-locally licensed in-house counsel providing pro bono. The chart addresses:

- Whether non-locally licensed attorneys can work for an employer in-state, either (1) in accordance with a registration or certification process, or (2) without registering, pursuant to an exception in the rule of professional conduct governing the unauthorized practice of law;
- Whether non-locally licensed in-house counsel who are permitted to work for their employer are also authorized to provide pro bono under a rule specific to in-house counsel;
- Whether non-locally licensed in-house counsel who are permitted to work for their employer are authorized to provide pro bono under a general rule governing attorneys licensed out-of-state; and
- Whether the rules permitting non-locally licensed in-house counsel to do pro bono require that pro bono services be provided in association with an approved organization and/or under the supervision of a locally licensed attorney.

Summary of Multijurisdictional Practice Rules by State

State	May Non-Locally Licensed Attorneys Work as In-House Counsel?	Rule on Non-Locally Licensed Attorneys Working as In-House Counsel	Rule on Registered In-House Counsel Pro Bono Practice	Rule on Out-of-State Attorneys Providing Pro Bono	Pro Bono Provision ⁸
Alabama	Yes – Registration	Ala. R. Gov. Adm. B. VIII ; Ala. R. Prof. Conduct 5.5(b)(3)	No	No	N/A
Alaska	Yes – No Registration	Alaska R. Prof. Conduct 5.5(d)(1)	No	Alaska Bar Rule 43.6	Out-of-state attorneys in good standing may provide free civil legal services under supervision of a qualified legal services provider.
Arizona	Yes – Registration	Ariz. Sup. Ct. R. 38(a) ; Ariz. R. Prof. Conduct 5.5(e)	Ariz. Sup. Ct. R. 38(d)(2)(B)(iv)	Ariz. Sup. Ct. R. 38(d)(2)(B)(ii)	Registered in-house counsel who have practiced law for at least five years may be certified to provide legal assistance after an authorized representative of the approved legal services organization files a notice with the Clerk of the Arizona Supreme Court, and the in-house counsel applies for authorization to provide pro bono legal services. - Out-of-state attorneys domiciled in Arizona who have practiced law for at least five years and successfully completed the course on Arizona law stipulated in Rule 34(j) may apply for

⁸ All jurisdictions with a pro bono provision require that the attorney must be qualified and in good standing in one or more U.S. jurisdictions; therefore, we have not repeated this requirement for each. Some rules include additional restrictions. See the text of the actual rules for complete information.

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					certification to provide pro bono legal services with an approved legal services organization.
Arkansas	Yes – No Registration	Ark. R. Prof. Conduct 5.5(d)(1)	No	Ark. Sup. Ct. Admin. Ord. No. 15.2	Out-of-state attorneys may provide pro bono services to persons of limited means under the auspices of an authorized legal aid organization that represents Arkansas clients.
California	Yes – Registration	Cal. R. of Ct. 9.46	Cal. R. Ct. 9.46(d)	No	Registered in-house counsel may provide pro bono services under the supervision of a California attorney for either eligible legal aid organizations or the qualifying institution that employs him or her. Counsel must submit a supplemental form identifying the legal aid organizations and the supervising attorney through which counsel intends to provide pro bono services.
Colorado	Yes – Registration	Colo. R. Gov. Adm. Prac. L. 204.1(1)	Colo. R. Civ. P. 204.1(4)	Colo. R. Civ. P. 204.6(1)(a)(ii)	<p>Certified in-house counsel may provide pro bono legal services under the auspices of a court, a bar association or Access to Justice Committee-sponsored program, a law school, or an organized non-profit entity whose purpose is or includes the provision of pro bono representation to indigent or near indigent persons, in accordance with Colorado Rule of Professional Conduct 6.1.</p> <p>-</p> <p>An out-of-state attorney domiciled in Colorado who is licensed to practice law</p>

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					in another state may apply for authorization to provide pro bono legal services under the auspices of one of these organizations, in accordance with Rule 6.1.
Connecticut	Yes – Registration	Conn. Practice Book § 2-15A(c)(5); Conn R. Prof. Conduct 5.5(d)(1)	Conn. Practice Book § 2-15A(c)(5)	No	Registered in-house counsel may provide pro bono legal services offered under the auspices of organized legal aid societies, or state/local bar association projects, or provided under the supervision of a member of the Connecticut Bar who is also working on the pro bono representation.
Delaware	Yes – Registration	Del. Sup. Ct. R. 55.1; Del. R. Prof. Conduct 5.5(d)(1)	Del. Sup. Ct. R. 55.1(d)(6)	No	Registered in-house counsel may participate in the provision of any and all legal services pro bono publico in Delaware offered under the auspices of organized legal aid societies, or state/local bar association projects, or provided under the supervision of a member of the Delaware Bar who is also working on the pro bono representation.
District of Columbia	Yes – No Registration	D.C. App. R. 49(c)(6)	No	D.C. App. R. 49(c)(9)(A)	Out-of-state attorneys may provide pro bono legal services provided that the individual is supervised by a member of the D.C. Bar on each pro bono matter, and provides services in affiliation with either a non-profit organization in the District of Columbia that routinely provides pro bono legal services, or with the legal pro bono program of the person's employer, if the employer is not a law firm.

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Florida	Yes – Registration	Fla. R. Regulating the Bar 17-1.2	Fla. R. Regulating the Bar 17-1.3(a)(4); Fla. R. Regulating the Bar 12-1.3	Fla R. Regulating the Bar 12-1.2 ; Fla. R. Regulating the Bar 12-1.3	<p>In-house counsel certified as authorized house counsel may provide pro bono legal services as an emeritus attorney if they (i) receives approval from the Clerk of the Supreme Court, (ii) work in association with an approved legal aid organization, (iii) work under the supervision of a Florida Bar member, and (iv) have not failed the Florida bar three or more times. If appearing in court or an administrative tribunal, the client and supervising attorney must provide written consent. The supervising attorney must sign all documents filed in any court or administrative tribunal.</p> <p>-</p> <p>Out-of-state attorneys may provide pro bono legal services as an emeritus attorney subject to the restrictions described above, and must have been engaged in the active practice of law for a minimum of 10 out of the 15 years immediately preceding the application to participate in the emeritus program, unless they are authorized house counsel.</p>
Georgia	Yes – No Registration	Ga. R. Prof. Conduct 5.5(d)(1)	No	Ga. Sup. Ct. R. 114-120	<p>Out-of-state attorneys may apply to provide pro bono services if supervised by a licensed practicing attorney who is employed by or volunteers with an enumerated organization. Valid for a period not to exceed 18 months.</p>

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Hawaii	No	No	No	No	N/A
Idaho	Yes – Registration	Idaho St. Bar R. 225	Idaho St. Bar R. 225(e)	Idaho St. Bar R. 228(b)-(c)	<p>A person licensed as in-house counsel may perform pro bono service in association with an approved legal assistance organization.</p> <p>-</p> <p>An attorney who is or was actively licensed to practice law in any U.S. state or territory or in D.C., within the preceding five (5) years, may apply to practice law as an emeritus attorney for an approved legal assistance organization.</p>
Illinois	Yes – Registration	Ill. Sup. Ct. R. 716	Ill. Sup. Ct. R. 716(g)	Ill. Sup. Ct. R. 756(k)(1)	<p>Registered in-house counsel may provide voluntary pro bono public services as defined in Rule 756(f) of the Illinois Rules on Admission and Discipline of Attorneys.</p> <p>-</p> <p>An out-of-state attorney in good standing may provide pro bono legal services to persons of limited means or to organizations, under the auspices of a sponsoring entity, which must be a not-for-profit legal services organization, governmental entity, law school clinical program, or bar association providing pro bono legal services.</p>

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Indiana	Yes – Registration	Ind. Adm. Disc. R. 6 § 2 ; Ind. R. Prof. Conduct 5.5(d)(1)	Ind. Adm. Disc. R. 6 § 2(b) ; Ind. Admis. Disc. R. 6 § 2(b) ; Ind. Admis. Disc. R. 6.2	Ind. Admis. Disc. R. 6.2 § 1(c)(ii)	Registered in-house counsel who intend to provide pro bono legal services to persons of limited means through a pro bono or other legal service organization eligible for fee waiver under state law may apply to be a pro bono publico attorney. - Out-of-state attorneys in good standing who intend to provide legal services free of charge to persons of limited means through a pro bono or other legal service organization eligible for a fee waiver under state law may apply to be a pro bono publico attorney.

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Iowa	Yes – Registration	Iowa Ct. R. 31.16; Iowa R. Prof. Conduct 32:5.5(d)(1)	Iowa Ct. R. 31.16(3)(b)	Iowa Ct. R. 31.19(2)(a)	<p>Registered in-house attorneys who are not foreign lawyers are authorized to provide pro bono legal services through an established not-for-profit bar association, pro bono program, or legal services program, or through such organizations specifically authorized in the state.</p> <p>-</p> <p>Through Iowa’s emeritus attorney pro bono program, an out-of-state attorney in good standing, may provide pro bono legal services in association with an approved legal aid organization, including programs sponsored by a bar association, law school, or a not-for-profit legal aid organization, whose primary purpose is to provide legal representation to low-income persons in Iowa.</p>
Kansas	Yes – Registration	Kan. R. Att’y Adm. 721; Kan. R. Prof. Conduct 5.5(d)(1)	Kan. Sup. Ct. R. 1404	No	Registered in-house attorneys in good standing are authorized to provide pro bono legal services through an approved nonprofit provider of legal services, a nonprofit program, or an accredited law school clinic, which has received authorization for the attorney to do pro bono.

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Kentucky	Yes – Registration	Ky. Sup. Ct. R. 2.111; Ky. Sup. Ct. R. 3.130(5.5)(d)(1)	Ky. Sup. Ct. R. 2.111(4)(c)	No	Registered in-house attorneys may provide legal services through a duly organized legal aid program offering pro bono representation to indigent individuals in Kentucky or a local bar association legal pro bono program or initiative.
Louisiana	Yes – Registration	La. Sup. Ct. R. XVII § 14; La. R. Prof. Conduct 5.5(d)(1)	No	No	N/A
Maine	Yes – No Registration	Me. R. Prof. Conduct 5.5(d)(1)	No	No	N/A
Maryland	Yes – No Registration	Md. Code Ann., Bus. Occ. & Prof. § 10-206(d); Md. R. Prof. Conduct 19-305.5(d)(1)	No	Md. R. Att’y 19-218	Out-of-state attorneys may be certified to provide pro bono legal assistance, under the supervision of a Maryland Bar member, in association with an approved entity that provides civil legal services to low-income individuals in Maryland, the Maryland Office of the Public Defender, a clinic in a courthouse offering pro bono legal services, or a local pro bono committee or bar association affiliated project that provides pro bono legal services.

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Massachusetts	Yes – Registration	Mass. Sup. Ct. R. 4.02(9); Mass. R. Prof. C. 5.5(d)(1)	Mass. Sup. Ct. R. 4.02(9)(b)	No	Registered in-house counsel may provide pro bono legal services under the auspices of either (1) an approved legal services organization or (2) a lawyer admitted to practice and in good standing in the Commonwealth of Massachusetts.
Michigan	Yes - Registration	Mich. R. Bd. L. Exam. 5(F); Mich. R. Prof. Conduct 5.5(d)(1)	No	No	N/A
Minnesota	Yes – Registration	Minn. R. Adm. B. 9; Minn. R. Adm. B. 10	Minn. R. Adm. B. 9; Minn. R. Adm. B. 10	No	Attorneys admitted as temporary in-house counsel are authorized to provide pro bono legal representation to clients referred by an approved legal services provider. If practicing for more than 12 months, they must apply for a house counsel license under Rule 10.
Mississippi	Yes - Registration	Miss. R. Prof. C. 5.5(d)	No	Miss. R. App. P. 46(f)(1)(i)(b)	An out-of-state attorney in good standing may apply to be admitted as a pro bono publicus attorney to provide free legal services under the supervision of a qualified legal services provider (an approved not-for-profit legal aid organization).
Missouri	Yes – Registration	Mo. Sup. Ct. R. 8.105; Mo. Sup. Ct. R. 4-5.5(d)	Mo. Sup. Ct. R. 8.105(c)	No	Registered in-house counsel may engage in pro bono work with an organization approved for this purpose by the Missouri Bar.

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Montana	Yes – No Registration	Mont. R. Prof. Conduct 5.5(d)(1)	No	No	N/A
Nebraska	Yes – Registration	Neb. Sup. Ct. R. § 3-1201 ; Neb. Sup. Ct. R. § 3-505.5(d)(1)	Neb. Sup. Ct. R. 3-1201(D)	No	Registered in-house counsel may provide pro bono legal services through an established not-for-profit association, pro bono program or legal services program or through such organizations specifically authorized in Nebraska.
Nevada	Yes – Registration	Nev. Sup. Ct. R. 49.1(1)(h) ; Nev. R. Prof. Conduct 5.5(b)(3)	Nev. Sup. Ct. R. 49.1(4) ; Nev. Sup. Ct. R. 49.2	Nev. Sup. Ct. R. 49.1(1)(b) ; Nev. Sup. Ct. R. 49.2	Registered in-house counsel are permitted to perform pro bono services through an Emeritus Attorney Pro Bono program to assist low-income clients through approved legal services providers. - Out-of-state attorneys may apply for limited practice certification if the attorney is volunteering with an Emeritus Attorney Pro Bono program to assist low-income clients through approved legal services providers.
New Hampshire	Yes – No Registration	N.H. R. Prof. Conduct 5.5(d)(1)	No	No	N/A

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New Jersey	Yes – Registration	N.J. Ct. R. 1:27-2; N.J. R. Prof. Conduct 5.5(b)(2)	N.J. Ct. R. 1:27-2(g)	N.J. Ct. R. 1:21-3(c)	<p>Limited license in-house counsel may provide pro bono legal services as a volunteer with a certified legal services or public interest organization, law school clinical or pro bono program, or approved governmental entity.</p> <p>-</p> <p>An out-of-state attorney employed by, associated with, or serving as a volunteer pro bono attorney with an approved legal services organization, public interest organization, law school clinical program, or pro bono program may practice under the supervision of a New Jersey bar member.</p>
New Mexico	Yes – Registration	N.M. R. Bar Adm. 15-308; N.M. R. Prof. Conduct 16-505(F)(3)	N.M. R. Bar Adm. 15-308(H)(1)(e)	N.M. R. Bar Adm. 15-305	<p>Registered in-house counsel may provide pro bono legal services under the auspices of organized legal aid societies, Supreme Court, or bar association projects, or under the supervision of an attorney licensed to practice law in New Mexico who is also working on the pro bono representation.</p> <p>-</p> <p>Out-of-state attorneys in good standing may apply for a limited license to practice on behalf of a qualified legal services provider who employs them (for compensation or otherwise), to represent legal services clients, by providing a letter from the legal services provider.</p>

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New York	Yes – Registration	22 CRR-NY § 522.1	22 NYCRR § 522.8	No	Registered in-house counsel may provide pro bono legal services in accordance with New York Rules of Professional Conduct rule 6.1(b) and other comparable definitions of pro bono legal services in New York.
North Carolina	Yes – No Registration	N.C.G.S. § 84-5(b); N.C. R. Prof. Conduct 5.5(d)(1)	27 N.C.A.C. Ch. 1D – §.0905(f)	27 N.C.A.C. Ch. 1D – §.0905	In-house counsel may petition to provide pro bono legal services to indigent persons under the supervision of a member of the North Carolina bar employed by a nonprofit corporation qualified to render legal services. - Out-of-state attorneys may petition to provide pro bono legal services to indigent persons under the supervision of a member of the North Carolina bar employed by a nonprofit corporation qualified to render legal services.
North Dakota	Yes – Registration	N.D. Sup. Ct. Admission Prac. R. 3(C); N.D. R. Prof. Conduct 5.5(b)(1)	No	N.D. Sup. Ct. Adm. Prac. R. 3.1	Out-of-state attorneys with 5+ years of experience may, upon application, practice as an unpaid volunteer under the supervision of an approved legal services organization so long as that organization employs at least one North Dakota attorney.

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Ohio	Yes – Registration	Ohio Sup. Ct. Gov. Bar R. VI § 6; Ohio R. Prof. Cond. 5.5(d)(1)	Ohio Sup. Ct. Gov. Bar R. VI § 6(G)	No	Corporate counsel may provide pro bono legal service if the legal service is provided to either a person of limited means or a charitable organization and the legal service is assigned, verified, and reported to the Commission on Continuing Legal Education by an approved organization.
Oklahoma	Yes – Registration	Okla. R. Gov. Adm. Prac. Law Rule Two § 1(A)(b); Okla R. Prof. Conduct 5.5(d)(1)	No	No	N/A
Oregon	Yes – Registration	Or. Sup. Ct. R. Adm. Att’y § 16.1; Or. R. Prof. Conduct 5.5(c)(5)	Or. Sup. Ct. R. Adm. Att’y § 16.1(7)(f)	Or. Sup. Ct. R. Adm. Att’y § 17.1	Registered in-house counsel may provide pro bono legal services through a pro bono program certified by the Oregon State Bar, provided that the attorney has professional liability coverage for the pro bono services. - Out-of-state attorneys who have practiced law for at least 15 years may apply to become an Active Pro Bono Attorney to practice law with a certified legal services provider approved by the Oregon State Bar.

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Pennsylvania	Yes – Registration	Pa. Bar Adm. R. 302; Pa. R. Prof. Conduct 5.5(d)(1)	Pa. Bar Adm. R. 302(b)(3)	No	Registered in-house counsel may participate in the provision of pro bono services offered under the auspices of organized legal aid societies or state/local bar association projects or provided under the supervision of an attorney licensed in Pennsylvania who is also working on the pro bono representation.
Rhode Island	Yes – Registration	R.I. Sup. Ct. Art. II R. 9(b) R.I. R. Prof. Conduct 5.5(d)(1)	R.I. Sup. Ct. Art. II R. 9(b)	R.I. Sup. Ct. Art. II R. 2(b)	Registered in-house counsel may provide pro bono legal services offered and supervised by the Rhode Island Bar Association. - Out-of-state attorneys may apply to provide pro bono legal services if associated with an organized and Supreme Court approved program providing legal services to indigent people. Valid for a period not longer than two years.
South Carolina	Yes – Registration	S.C. App. Ct. R. 405; S.C. App. Ct. R. 5.5(d)(1)	S.C. App. Ct. R. 405(m)	No	Registered in-house counsel may provide pro bono legal services if they are associated with an approved legal services organization which receives, or is eligible to receive, funds from the Legal Services Corporation, or if they are working on a case or project through the South Carolina Bar Pro Bono Program, and if they are supervised by a member of the South Carolina Bar.

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South Dakota	Yes – No Registration	S.D. R. Prof. Conduct 5.5(d)(1)	No	No	N/A
Tennessee	Yes – Registration	Tenn. Sup. Ct. R. 7 § 10.01; Tenn. Sup. Ct. R. 8 § 5.5(d)(1)	Tenn. Sup. Ct. R. 7 § 10.01(c); Tenn. Sup. Ct. R. 8 § 5.5(e)	No	Registered in-house attorneys may provide pro bono legal services through an established not-for-profit bar association, pro bono program or legal services program or through such organizations specifically authorized in this jurisdiction.
Texas	Yes – No Registration	Tex. R. Prof. Conduct 5.05(c)	No	Tex. State Bar R. Art. XIII	Out-of-state attorneys may participate in the New Opportunities Volunteer Attorney (“NOVA”) Pro Bono Program to provide legal services under the supervision of an approved legal service organization.

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Utah	Yes – Registration	Utah Jud. Admin. R. 14-719 ; Utah R. Prof. Conduct 5.5(d)(1) ;	Utah Jud. Admin. R. 14-719(a)(2) ; Utah Jud. Admin. R. 14-803	Utah Jud. Admin. R. 14-803	Registered in-house counsel may provide pro bono legal services under the auspices of an approved sponsoring entity consistent with Rule 14-803 of the Utah Rules of Lawyer Discipline and Disability. - Out-of-state attorneys in good standing may provide pro bono legal services to persons of limited means or specific organizations, under the auspices of a sponsoring entity, which must be a not-for-profit legal services organization, governmental entity, law school, Utah State Bar affiliate or other organization so designated by the Utah State Bar as providing <i>pro bono</i> legal services.
Vermont	Yes – No Registration	Vt. R. Prof. Cond. 5.5(d)(1)	No	Vt. Admin. Ord. of Sup. Ct. 41 § 11	Out-of-state attorneys may provide pro bono legal services under the auspices of a nonprofit organization, to persons of limited means or charitable, religious, civic, community, governmental, and educational organizations which are designed primarily to address the needs of persons of limited means.
Virginia	Yes – Registration	Va. Sup. Ct. R. 1A:5 ; Va. R. Prof. Cond. 5.5(d)(5)	Va. Sup. Ct. R. 1A:5 Part I(f)	No	In-house counsel certified under Part I of Va. Sup. Ct. R. 1A:5 may provide voluntary pro bono publico services in accordance with Rule 6.1 of the Virginia Rules of Professional Conduct. There is no pro bono provision for in-house counsel certified under Part II of Va. Sup. Ct. R. 1A:5.

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Washington	Yes – Registration	Wash. Adm. & Prac. R. 8(f); Wash. R. Prof. Conduct 5.5(d)(1)	Wash. Adm. & Prac. R. 8(f)(8)	No	Registered in-house counsel may provide pro bono legal services through a qualified legal services provider for indigent clients.
West Virginia	Yes – No Registration	W. Va. R. Prof. Conduct 5.5(d)(1)	No	W. Va. R. Adm. Prac. Law 9.0	Out-of-state attorneys, upon application, may provide pro bono legal assistance in causes in which he or she is associated with an organized legal services or public defender program sponsored, approved or recognized by the Board of Law Examiners. An attorney can only practice under this rule for 60 months.
Wisconsin	Yes – Registration	Wisc. Sup. Ct. R. 10.03(4); Wisc. Sup. Ct. R. 20:5.5(d)(1)	Wisc. Sup. Ct. R. 10.03(4)(f)	No	Registered in-house counsel may provide pro bono legal services as provided in SCR 20:6.1 (Rule 6.1 of the Wisconsin Rules of Professional Conduct).
Wyoming	Yes – No Registration	Rules Gov. Wyo. State Bar & Auth. Prac. Law R. 7(a)(5)	No	No	N/A
Select U.S. Territories					
Guam	Yes – No Registration	Guam R. Prof. Conduct 5.5(d)(1)	No	No	N/A

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U.S. Virgin Islands	Yes –Registration	V.I. Sup. Ct. R. 202.1	V.I. Sup. Ct. R. 202.1(d)(3)	No	Certified in-house counsel may provide pro bono legal services under the auspices of an organized legal aid society recognized by the V.I. Access to Justice Commission or any pro bono panel established by the V.I. Judiciary, under supervision by a regular member of the V.I. Bar.

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CPBO, a global project of Pro Bono Institute designed to support in-house counsel in their efforts to do pro bono work, works with in-house counsel from jurisdictions impacted by these restrictive rules to advocate for reforms. Legal departments and in-house lawyers interested in rule reform should contact CPBO’s Director at cpbo@probonoinst.org.

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