

CONTINUING LEGAL EDUCATION (CLE) CREDITS AND PRO BONO

Background on CLE Credit Regulations

Most jurisdictions in the U.S. require their licensed attorneys to earn a minimum number of Continuing Legal Education (CLE) credits per compliance period to maintain good standing with their jurisdiction's bar association. Each jurisdiction makes its own determination about which programs are eligible for CLE credit. Typically, approved programs are classes with written course materials, contingent on their duration and content. In recent years, however, more states have permitted attorneys to earn some CLE credits through pro bono service.

There is much variation in the rules regarding pro bono service for CLE credit. The ABA encourages lawyers to complete an annual 50-hour goal of pro bono service. Per its February 2017 Report on the Model Rule for Minimum Continuing Legal Education (MCLE) and Comments, the ABA does not take a position on whether pro bono credits should be counted toward CLE credits.¹

Recent Expansion of Pro Bono CLE Credit

In recent years, more jurisdictions have allowed pro bono legal service to count for CLE credit. In 2025, Illinois began a two-year pilot program allowing attorneys to receive CLE credit for providing pro bono legal assistance through one specific pro bono program, the virtual legal advice clinic, Illinois Free Legal Answers. Connecticut also introduced a rule to count pro bono work for CLE credit in 2025, permitting volunteers to earn CLE by performing pro bono legal services through certain court, nonprofit, and bar association programs.

Likewise, some jurisdictions are increasing how many CLE credits may be earned through pro bono service. As of November 2024, Delaware allows one CLE credit hour for every two hours of legal services performed, with a maximum of twenty CLE credit hours per two-year compliance period (compared to a maximum of six CLE credit hours previously).

As of June 2026, 28 states – over half of the 46 U.S. jurisdictions that have a CLE mandate – permit some CLE credit to be earned through pro bono legal representation. The other 18 states that have a CLE mandate do not count any pro bono service for CLE credit. One state permits pro bono mentoring, but not pro bono service, to count for CLE credit. Currently, four U.S. states and Washington, D.C. do not have a CLE mandate.

Considerations in allowing Pro Bono Service for CLE Credit

Arguably, standardizing CLE credit for pro bono service has the immense potential to increase pro bono activity by lawyers because it goes beyond the traditional incentives currently in place in many jurisdictions.² Per the November 2024 report from the ABA's Standing Committee on Pro

¹ See American Bar Association, "Model Rule for Minimum Continuing Legal Education," at 14 (February 2017), https://www.americanbar.org/content/dam/aba/directories/policy/midyear-2017/2017_hod_midyear_106.pdf.

² See Rima Sirota, *Making CLE Voluntary and Pro Bono Mandatory: A Law Faculty Test Case*, 78 La. L. Rev. 547, 578 (2018).

Bono and Public Service, which surveyed more than 19,000 attorneys in 23 states, earning CLE credit for pro bono work remains one of the higher-rated incentives. CLE credit is tied for fourth among the twenty incentive categories examined.³ Such statistics develop the framework and support for allowing pro bono service to count toward CLE credit across U.S. jurisdictions.

A contrary view advocates that CLE should be limited to coursework because of CLE's key function to keep attorneys apprised of new developments in the law.⁴ However, CLE is *one* platform to satisfy this obligation. A lawyer's professional responsibility to be a competent advocate requires them to stay up to date on new legal developments, regardless of CLE programs. This is illustrated by the five U.S. jurisdictions that do not have a CLE mandate yet expect their attorneys to be apprised of such new developments. Further, no jurisdiction allows an attorney to satisfy their CLE credit requirement solely through pro bono service.

Challenges to Pro Bono Participation

Currently, the rules regarding CLE credit and pro bono service are treated separately in most jurisdictions. Lawyers are tasked with the challenge of maintaining their CLE credit requirements on top of their already demanding schedules to avoid compliance consequences while engaging in pro bono work to satisfy their ethical and professional obligations. Lack of time is the number one factor in discouraging pro bono service, with more than half of all attorneys labeling it as "very discouraging."⁵ The inability to earn CLE credit for pro bono service could result in attorneys decreasing priority for pro bono due to the many competing demands on attorneys' time.

Variations in State Pro Bono CLE Credit Rules

The jurisdictions that permit some pro bono service to count for CLE credit have differences in their rules. Such common themes include:

- A varying number of pro bono hours for every hour of CLE credit.
- A varying maximum CLE credits from hours of pro bono service that may be earned and reported during a state's compliance period.
- A state-specific itemized list of pro bono organizations with which the attorney must perform pro bono services for the pro bono hours to be eligible for CLE credit.

The chart below reviews the rules governing CLE credit for pro bono service in all fifty states and the District of Columbia. The chart contains a short excerpt or summary of the state's rule, including the conditions surrounding how credit is earned.

³ See American Bar Association, "Supporting Justice V: A Report on the Pro Bono Work of America's Lawyers" (November 2024), https://www.americanbar.org/content/dam/aba/administrative/probono_public_service/other-documents/supporting-justice-v.pdf, at 24 (Figure 18).

⁴ See Tom Lininger, *Exploring Strategies to Promote Access to Justice*, 31 Geo. J. Legal Ethics 357, 369 (2018).

⁵ See American Bar Association, "Supporting Justice V: A Report on the Pro Bono Work of America's Lawyers" (November 2024), https://www.americanbar.org/content/dam/aba/administrative/probono_public_service/other-documents/supporting-justice-v.pdf, at 23.

Summary of State Status on CLE Credit for Pro Bono Service

State	Rule on Pro Bono Service & CLE Credit	Rule Highlights ⁶
Alabama	<u>Ala. State Bar Mandatory CLE R. 3.9</u>	One hour of MCLE credit for every six hours of pro bono work with an approved provider, with a maximum of three MCLE credits in the twelve-month compliance period.
Alaska	<u>Alaska B. R. Rule 65(e)(12)</u>	Participating as a mentor in a relationship with another member of the Alaska Bar for the purpose of training that other member in providing effective pro bono legal services counts for CLE credit. One CLE hour may also be awarded for every two hours of pro bono service under the supervision of a “qualified legal services provider” as defined in Alaska Bar Rule 43.2(c)(2).
Arizona	<u>Ariz. Sup. Ct. R. 45(a)(4)</u>	One hour of CLE credit for every five hours of pro bono service, with a maximum of five hours of CLE credit per educational year. Such credit counts toward the maximum number of self-study hours and must be reported in the attorney's annual affidavit of compliance.
Arkansas	<u>Ark. CLE Bd. Regul. R. 4.04(10)</u>	One hour of CLE credit for every three hours of pro bono service with an approved provider, with a maximum of three CLE credit hours per reporting period. Hours claimed must be rounded down to the nearest quarter of an hour. Attorneys seeking CLE credit for pro bono publico service shall complete and return to the Office of Professional Programs an “Application for CLE Credit for Pro Bono Publico Service” form.
California	<u>No CLE credit for pro bono service</u>	
Colorado	<u>Colo. R. Civ. P. 250.9</u>	One hour of CLE credit for every five hours of representation to an indigent client in a matter assigned by an approved entity, with a maximum of nine CLE credit hours during each three-year compliance period.
Connecticut	<u>Conn. P. B. Sec. 2-27A(b)(8)</u>	One hour of CLE credit is available for every three hours completed providing pro bono legal services through a program administered by any Connecticut nonprofit providing legal aid, a state, local, or affinity bar association, or any state or federal court in Connecticut, with a maximum of six hours earned during a calendar year.
Delaware	<u>Del. CLE R. 9(D)</u>	One CLE credit hour for every two hours of legal services performed pursuant to an

⁶ Some rules include additional restrictions. See the text of the actual rules for complete information.

State	Rule on Pro Bono Service & CLE Credit	Rule Highlights ⁶
		approved appointment or assignment, with a maximum of twenty CLE credit hours per two-year compliance period. Ethics credit may not be earned through pro bono service.
District of Columbia	No CLE mandate	
Florida	Rule Reg. Fla. Bar 6-10.3	One hour of general CLE credit for every hour of pro bono service. Lawyers may earn up to five credit hours of CLE credit through pro bono service during a three-year reporting cycle.
Georgia	No CLE credit for pro bono service	Reform to allow CLE credit for pro bono service hours has been recommended by the Supreme Court of Georgia's Study Committee but a change has not been implemented. ⁷
Hawai'i	No CLE credit for pro bono service	
Idaho	No CLE credit for pro bono service	
Illinois	Sup. Ct. R. 795(d)(14) Amendment to Rule 795(d)(14)	From July 1, 2025, through June 30, 2027, Illinois attorneys may receive CLE credit for providing pro bono legal services through Illinois Free Legal Answers, at a rate of 1 hour of MCLE credit for every two hours of pro bono participation, up to a maximum of five credits per two-year MCLE reporting period. There is no CLE credit for providing any other pro bono services. The rule was amended in May 2026 to allow newly admitted attorneys to participate in this program.
Indiana	No CLE credit for pro bono service	
Iowa	No CLE credit for pro bono service	
Kansas	No CLE credit for pro bono service	
Kentucky	No CLE credit for pro bono service	
Louisiana	La. Sup. R. XXX Regul. 3.21	One hour of CLE credit for five hours of pro bono services in an approved matter, with a maximum of three hours of CLE credit per calendar year.
Maine	Maine Bar Rule 5(f)(8)	For calendar years 2025 and 2026, attorneys may earn one CLE credit hour for every three hours of pro bono service for a maximum of three CLE hours. Eligible service must be

⁷ See Ga. Sup. Ct. Study Comm. on Legal Regulatory Reform, *Report and Recommendations* 47 (June 30, 2025), https://assets.georgiacourts.gov/2/wp-content/uploads/2026/01/22165038/GA-Supreme-Court-Report-on-Legal-Regulatory-Reform_6-30-25.pdf.

State	Rule on Pro Bono Service & CLE Credit	Rule Highlights ⁶
		assigned by one of the specified legal aid, public interest, or Board-approved organizations.
Maryland	No CLE mandate	
Massachusetts	No CLE mandate	
Michigan	No CLE mandate	
Minnesota	Minn. State Bd. of CLE Ct. R. 6(D)	One hour of CLE credit for every six hours of pro bono legal representation in an approved matter, with a maximum of six credit hours per reporting period.
Mississippi	No CLE credit for pro bono service	
Missouri	No CLE credit for pro bono service	
Montana	No CLE credit for pro bono service	
Nebraska	No CLE credit for pro bono service	
Nevada	Nev. Sup. Ct. R. 210(3)	One hour of CLE credit for each three hours of pro bono legal services performed with an approved provider, with a maximum of four hours of CLE credit per year. Eligible service must be performed through a legal aid organization, court, or governmental or nonprofit pro bono program approved by the Nevada Supreme Court Access to Justice Commission.
New Hampshire	53.1. NH MCLE Requirement	Active lawyers who volunteer for assigned, pro bono cases with an approved provider may claim up to three hundred and sixty (360) general minutes of CLE credit per reporting period at the rate, prorated as applicable, of sixty (60) CLE minutes for every 300 minutes of pro bono representation. Eligible service must be assigned through 603 Legal Aid, NH Legal Assistance, Veterans Legal Justice, or the Disability Rights Center. Ethics credit may not be earned through pro bono service.
New Jersey	No CLE credit for pro bono service	
New Mexico	N.M. Minimum CLE R. 18-204(C)(1)	CLE credit may be awarded for performing pro bono legal services through a BBC-accredited legal service provider.
New York	N.Y. State CLE Board Regul. and Guidelines §1500.22(j)	One CLE credit hour can be awarded for performing legal services with a court or CLE Board-accredited bar association or legal services program. A maximum of ten pro bono CLE credit hours may be earned during the two-year reporting period. An additional five hours of CLE credit may be earned subject to the requirements and limitations set by the CLE Board.

State	Rule on Pro Bono Service & CLE Credit	Rule Highlights ⁶
North Carolina	No CLE credit for pro bono service	
North Dakota	N.D State Bar Ass'n CLE Policies § I, Policy 1.19	One hour of CLE credit for every six hours of pro bono service, with a maximum of three CLE credit hours per reporting period.
Ohio	Ohio Sup. Ct. R. X, § 5(G)(2)	One CLE credit hour for every six hours of pro bono service, with a maximum of six credit hours during a biennial compliance period.
Oklahoma	No CLE credit for pro bono service	
Oregon	Or. State Bar Rules of L. 9.13	One MCLE credit hour for every two hours of qualifying pro bono service, up to a maximum of six MCLE credit hours per full reporting period (three credits during a short reporting period).
Pennsylvania	Pa. CLE Reg. Sec. 5(i)	One hour of CLE credit may be earned for every five hours of pro bono service performed through an accredited provider. A maximum of three CLE credits for pro bono service may be earned per compliance period. ⁸
Rhode Island	No CLE credit for pro bono service	
South Carolina	S.C. Pilot Program for CLE Credit, App. Case No. 2021-000392	Since July 2021, attorneys may receive CLE credit for participating in the Charleston Housing Court Pro Bono Program. Attorneys may receive two hours of CLE credit for completing the required training and two additional hours for each qualifying Housing Court session attended, up to a maximum of four credits per reporting period, in addition to the training credit. Program is limited to Charleston Housing Court volunteers and remains in effect until rescinded by a future court order.
South Dakota	No CLE mandate	
Tennessee	Tenn. Sup. Ct. Mandatory CLE R. 21, § 4.08(c)	One hour of credit for every five billable hours of pro bono service with an approved provider, with an annual maximum of three CLE credits for pro bono per compliance period.
Texas	No CLE credit for pro bono service Texas MCLE Regulations 2.1.1(b)	No CLE credit for pro bono service; however, participation in the Pro Bono Mentor Match, or serving as a mentor with another approved program, can earn up to 5 hours of participatory MCLE credit, including one hour of ethics, annually, for time spent in consultations between the mentor and the mentee.

⁸ See PACLE, “Pro Bono Program,” (2024), <https://www.pacle.org/providers/pro-bono>.

State	Rule on Pro Bono Service & CLE Credit	Rule Highlights ⁶
Utah	Utah Code of Judicial Admin. Rule 1-619	One hour of credit will be awarded for performing five hours of pro bono services or mentoring another lawyer or law student on pro bono. A lawyer may earn a maximum of two CLE credits per Compliance Cycle. Pro bono matters must be referred from a Utah court, state bar, or sponsoring entity and remain under their direction to be eligible for credit.
Vermont	No CLE credit for pro bono service	
Virginia	Va. MCLE Regulation 102 (h)	One hour of credit can be earned for every four hours of service and up to five credit hours may be reported each period. Attorneys must obtain a QLSP-certified affirmation form and submit it to the MCLE Department to receive credit.
Washington	Wash. Mandatory CLE R. 11(e)(7)	One credit for every hour of pro bono legal service performed through a qualified legal service provider (QLSP).
West Virginia	W. Va. State Bar Admin. R. 6.05(f)	One hour of CLE credit for every three hours of pro bono service with an approved provider, with a maximum of six hours of CLE credit for pro bono in any two-year reporting period.
Wisconsin	Wis. Sup. Ct. CLE R. 31.05(7)	One hour of CLE credit for every five hours of pro bono service, with a maximum of six CLE credits for pro bono per reporting period.
Wyoming	Wyo. State Board of CLE R. 5(c)	One hour of CLE credit for every two hours of pro bono service, with a maximum of five CLE credit hours for pro bono each calendar year.

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