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Governor Gavin C. Newsom

MEMORANDUM

DATE: September 19, 2025

TO: INTERESTED PARTIES

/s/ Michelle LaGrandeur

FROM: Michelle La Grandeur

Chief, Policy Division

SUBJECT: USE OF GENERALIST EXPERIENCE TO QUALIFY FOR SPECIALIZED

OR TECHNICAL CLASSIFICATIONS

Purpose

This memo provides guidance on whether generalist analytical experience may be credited toward the minimum qualifications (MQs) of specialized or technical classifications.

Background

Departments have raised questions regarding whether generalist experience, such as that obtained in the Staff Services Analyst (SSA) or Associate Governmental Program Analyst (AGPA) classifications, may be credited to meet the MQs of specialized or technical classes.

In January 2018, multiple information technology (IT) classes were consolidated to update and modernize California's IT workforce. As part of this consolidation, the Board adopted a prohibition against using generalist experience to meet IT MQs unless the candidate has qualifying experience as part of a documented and approved Out-of-Class (OOC) or Training and Development (T&D) assignment.

The Board has been informed that appointing authorities may be applying this guidance to all classifications, and not just IT classifications. As a result, the Board has been asked to clarify intent.

Analysis

Government Code section 18930 requires that examinations "fairly test and determine

the qualifications, fitness, and ability of competitors actually to perform the duties of the class of position for which they seek appointment." Government Code section 18931 further requires the Board to establish MQs that define the education, experience, knowledge, and abilities needed for each classification. Together, these provisions mean that the class specification, adopted by the Board, is the controlling legal authority for MQ determinations.

The Board's Appeals Division has reinforced this principle. In SPB Case No. 24-0354N, the Appeals Division held that the duties performed by an employee in a generalist classification could qualify for a non-IT specialized classification if those duties were "squarely related" to the work described in the specialized class specification. The decision emphasized two key points:

1. Classification specifications control.

Tools like the Form 511B may help guide analysis, but they cannot override or contradict the class specification or other Board guidance. Where there is conflict, the specification or other Board guidance is the binding authority.

2. Level of responsibility matters.

The Board looked to <u>California Code of Regulations</u>, <u>title 2</u>, <u>section 428</u>¹, subd. (b) to determine whether the Appellant's service in another classification was comparable in level to the specialized class, and credited the experience when the duties aligned.

This reasoning applies directly to the use of generalist analytical experience. Generalist classes are intentionally broad, encompassing work in budgeting, personnel, labor relations, and program evaluation. If the duties actually performed in a generalist assignment meet the "specialized" requirements (e.g., scope; level; special requirements, such as licensure; etc.) as specified by the classification's MQs, that experience may be credited.

This approach is also consistent with the State's consolidation of classes and the broadening of MQs to recognize transferable skills. It avoids rigid categorical exclusions, while ensuring departments test whether candidates can in fact perform the duties of the class; exactly what Government Code section 18930 requires.

But the limits remain important. First, the Board has expressly prohibited reliance on

¹ Regulation sections under the California Code of Regulations, title 2, will hereafter be referred to as "Rule". Rules 425-430 govern the requirements for appropriate transfers.

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generalist experience in certain cases, such as meeting the MQs of IT classifications. Second, duties performed outside the scope of a generalist class specification cannot be credited unless they were formally authorized through an OOC or T&D assignment.

In other words, departments must make two independent analyses: (1) whether the duties performed are qualifying under the specialized class's MQs; and (2) whether those duties were lawfully within the scope of the generalist class or properly authorized by OOC or T&D assignment.

Guidance for Departments

Generalist analytical experience may be credited toward specialized or technical classifications when the duties performed are substantially consistent with the requirements of the specialized class specification. Nothing in statute or regulation prohibits departments from following this practice, and Board decisions confirm that class specifications are the governing authority.

Departments must, therefore:

- Review the MQ language carefully;
- Compare MQs with the actual duties performed in the generalist classification;
- Confirm that any duties outside the scope of the employee's generalist classification are documented through an OOC or T&D assignment; and
- Apply restrictions only where expressly required, such as in IT classifications.
- Document analysis for audit purposes.

This approach preserves the integrity of the merit civil service system while allowing transferable skills from generalist positions to be recognized in a manner consistent with both statute and Board decisions.

Conclusion

If there are questions about this memo, please contact the Board at SPBPolicyDivision@spb.ca.gov. If there are questions about MQ determinations, please contact CalHR's Selection division at MQassistance@calhr.ca.gov.

Authorities

Government Code section 18930 Government Code section 18931