

## MEMORANDUM

**DATE:** September 25, 2025

**TO:** **INTERESTED PARTIES**

**FROM:** **/s/ Michelle LaGrandeur**  
Michelle La Grandeur  
Chief, Policy Division

**SUBJECT: INTERPRETING “EQUIVALENT TO GRADUATION FROM COLLEGE”  
IN MINIMUM QUALIFICATIONS**

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### Purpose

This memo gives departments clear, uniform guidance on the meaning of the phrase “equivalent to graduation from college” referenced in minimum qualifications (MQs) contained in some class specifications and provides direction on evaluating candidates’ education when conducting an MQ determination.

### Background

Departments and candidates have asked for the Board’s guidance on how to interpret “equivalent to graduation from college” in classification specifications. Two Board decisions provide clarity on the issue:

- In SPB Case No. 21-1285N, the Board held that accredited coursework from multiple institutions may be considered together toward the educational requirement, even when no degree was awarded.
- In SPB Case No. 21-1344N, the Board treated the equivalency as met where the applicant had completed the number of accredited units associated with a bachelor’s degree. The Board found 120 semester units or 180 quarter units as the standard unit count that satisfies “equivalent to graduation from college,” even without a conferred degree.

An applicant meets the “equivalent to graduation from college” requirement by completing 120 semester or 180 quarter units of accredited coursework, even if no degree has been conferred. This threshold reflects the amount of accredited education generally required

for a bachelor's degree and is treated as education "equivalent to graduation from college."

These decisions are grounded in the merit principle expressed in Government Code sections 18931 and 18935, which require that MQs reflect the education needed to predict success in a classification.

### **Guidance for Departments**

Departments should think of "equivalent to graduation from college" as the completion of a specific number of college credits from an accredited institution, even if no degree has been conferred. This is different from "graduation from college," which requires a degree awarded by an accredited institution. When a classification specification prescribes "with specialization" or "with major work," departments should look for evidence that the applicant has studied the intended subject in depth.

When deciding whether a candidate meets the "equivalent to graduation from college" requirement, keep the following in mind:

- **Unit standard controls for general equivalency**

Completion of 120 semester units or 180 quarter units of credit-bearing coursework from one or more accredited colleges or universities satisfies "equivalent to graduation from college," even if no degree was awarded.

- **Accredited coursework may be combined**

Consider all accredited coursework completed by the applicant, including coursework from multiple accredited institutions, when counting toward the unit standard.

- **Specialization or major work requirements**

When a class specification requires "equivalent to graduation from college with specialization in [field]" or "with major work in [major]," first apply the 120/180 unit standard for the general equivalency. Then review the applicant's transcripts to see if the coursework shows a real focus in the subject, particularly in the upper division coursework.

- **Documentation**

Record the basis for your determination in the exam or hiring file in accordance with California Code of Regulations, title 2, section 26. Note the total accredited units, the institutions considered, and the key features of the subject-area

coursework if a specialization or major work is required. This supports consistency and transparency in case of an appeal and/or investigative or compliance review.

### **Classification Specification Amendments**

If there is a classification specification in which the education component mandates “equivalent to graduation from college” and an appointing authority has determined through subject matter experts or a job analysis that a college degree is absolutely required to fulfill the essential functions of the position, that appointing authority should contact the California Department of Human Resources’ (CalHR) Personnel Management Division. Conversely, if the class specifications requires specialization or major coursework and the appointing authority determines that a specific course of study is not related to successful job performance, the appointing authority should work through CalHR PMD to amend the class spec. Please review the [Human Resources’ Manual section 3501](#) for further information on that process.

### **Conclusion**

This guidance is intended to ensure departments apply the “equivalent to graduation from college” requirement in a consistent and legally sound manner, while retaining discretion when a specialization or major work is specified.

If there are questions about this memo, please contact the Board at [SPBPolicyDivision@spb.ca.gov](mailto:SPBPolicyDivision@spb.ca.gov). If there are questions about MQ determinations, please contact CalHR’s Selection division at [MQAssistance@calhr.ca.gov](mailto:MQAssistance@calhr.ca.gov)

### **Authorities**

[Government Code section 18931](#)  
[Government Code section 18935](#)