

Title: Camacho v. Coresis and The Office of the Ombudsman - Mindanao, et al.

Facts: Manuel Camacho, Dean of the College of Education at the University of Southeastern Philippines (USP), filed complaints against Dr. Sixto O. Daleon and other faculty members of USP for granting passing grades to three students—Agulo, Alaba, and Tecson—despite their failure to attend classes. The “special program of self-study” arranged by Dr. Daleon without approval led to wider university inquiry. After an investigation, the Board of Regents passed a resolution upholding the grades given. Camacho escalated the matter to the Office of the Ombudsman-Mindanao, asserting administrative and criminal violations, specifically under the Anti-Graft and Corrupt Practices Act (Republic Act 3019). The Ombudsman dismissed the complaint, stating there was insufficient evidence. Camacho’s subsequent motion for reconsideration was also denied.

Issues:

1. Whether Dr. Daleon and others’ actions of granting passing grades without class attendance violated university policies or law.
2. Whether the Board of Regents’ resolution upholding such grades was ultra vires and contrary to university law.
3. Whether academic freedom was misapplied to absolve respondents from administrative and criminal liabilities.
4. Whether due process violations occurred in the Ombudsman’s disposition for being based on hearsay and disregarding the petitioner’s evidence.

Court’s Decision: The Supreme Court dismissed the petition for certiorari, upholding the resolution of the Ombudsman. The Court found no grave abuse of discretion by the Ombudsman. Dr. Daleon, having been designated OIC of the Graduate School, was within his authority to modify attendance rules. The teaching method was supported by the Board of Regents and covered by academic freedom, which the Constitution extends to institutions and faculty. As there was no clear bad faith or manifest partiality shown in their actions, the exonerations were deemed proper.

Doctrine: The principle of academic freedom allows educational institutions and their faculties the autonomy to decide on the administration of courses and the teaching methods within the bounds of university rules and policies.

Class Notes:

- Substantial evidence is required for administrative rulings to be respected by courts.

- Academic freedom includes the institution's right to decide on educational matters and the teacher's right to teach and research freely.
- A university's Board of Regents is the ultimate authority on internal operations and policies.
- Decisions of administrative agencies bear weight when supported by substantial evidence.

Historical Background: The case reflects the balance between university autonomy, particularly in terms of grading and teaching methods, and the accountability mechanisms for potential administrative and legal misdemeanors. Against a backdrop where issues of academic responsibility take center stage, the case serves as a reminder of the broad extent of academic freedom recognized within Philippine higher education institutions, while also highlighting the procedural expectations for challenges to such freedom.