

Title: Teresita Tablarin et al. v. Honorable Angelina S. Gutierrez, Secretary of Education, Culture and Sports, Board of Medical Education, and Center for Educational Measurement (G.R. No. L-78164, July 31, 1987)

Facts: Petitioners Teresita Tablarin, Ma. Luz Ciriaco, Ma. Nimfa B. Rovira, and Evangelina S. Labao, on behalf of themselves and other applicants to medical colleges, challenged the constitutionality of the National Medical Admission Test (NMAT) requirement for admission to medical schools. They argued that this requirement, as enforced by the Board of Medical Education and the Center for Educational Measurement (CEM), violated their right to access to education and other rights protected by the Philippine Constitution.

The petitioners either did not take or failed the NMAT and subsequently filed a petition for declaratory judgment and prohibition with a prayer for a temporary restraining order with the Regional Trial Court (RTC) to enjoin the enforcement of Section 5 (a) and (f) of Republic Act No. 2382, as amended, and the Department of Education, Culture and Sports (DECS) Order No. 52, series of 1985. The RTC denied the petition for preliminary injunction, which led the petitioners to elevate the matter to the Supreme Court via a Special Civil Action for Certiorari, seeking to set aside the RTC's order.

Issues:

1. Whether the NMAT is in violation of the following constitutional provisions:
 - a. Article II, Sections 11, 13, and 17 - related to human dignity, youth's role in nation-building, and the state's priority to education and health.
 - b. Article XIV, Sections 1 and 5(3) - related to the right to education and professional course of study.
2. Whether there is undue delegation of legislative power to the Board of Medical Education without a sufficient statutory standard, thus contradicting the non-delegation doctrine.
3. Whether the NMAT and the cutoff score determined by the Board of Medical Education are unfair, unreasonable, inequitable, and violate the due process clause.
4. Whether the NMAT violates the equal protection clause by allowing different cutoff scores for different years.

Court's Decision:

1. The Court found that petitioners failed to substantiate how NMAT violated the cited constitutional provisions. The relevant articles of the Constitution do not guarantee access to medical education without passing admissions requirements deemed fair, reasonable, and equitable.

2. The Court ruled that the delegation of power to the Board of Medical Education had sufficient standards and congressional guidance expressed within the Medical Act of 1959, establishing that the non-delegation doctrine was not violated.

3. The Court held that NMAT was a valid exercise of the police power of the state. The NMAT regulation was found to be reasonably associated with the goal of securing the health and safety of the public by improving the quality of medical education.

4. Concerning equal protection, the Court found the varying NMAT cutoff scores valid, as varying scores could reflect changing conditions and are a necessary form of flexibility to adapt to different circumstances annually.

Doctrine:

The Supreme Court reiterates the principle that legislation and administrative regulations establishing standards for admission to professional schools, like requiring passing a pre-admission test such as the NMAT, are valid exercises of the state's police power to regulate professions that directly affect the public health and safety. Additionally, sufficient standards for delegation are found within the Medical Act of 1959 itself.

Class Notes:

- For non-delegation of legislative power, an implied or express standard may suffice (*Edu v. Ericta*).
- The characterization of NMAT as a valid police power exercise hinges on its reasonable relationship to the protection of public health.
- The sufficient standards test is satisfied when the objectives of the relevant law provide adequate guidance to the delegate.
- Equal protection does not require immutability of cutoff scores in admission tests if changing the scores yearly is based on fair and objective conditions.

Historical Background:

The NMAT requirement became an issue during the 1980s in the Philippines, within broader societal concerns regarding the quality and accessibility of professional education and the regulation of professions impacting public welfare. The case reflects the challenge of maintaining high standards in education amid socio-economic difficulties and is indicative of the government's regulatory role in ensuring the proficiency and qualifications of future medical professionals.