

Title: Soberejuanite-Flores v. Professional Regulation Commission: A Case on the Validity of Professional Licensure Requirements

Facts:

The case revolves around Republic Act No. 10029, known as the Philippine Psychology Act of 2009, which necessitated a licensure exam for practicing psychologists but allowed for certain exemptions. Section 16 of RA No. 10029 detailed the criteria for psychologists to be registered without examination, contingent on educational attainment and work experience. Florentina Caoyong Soberejuanite-Flores applied for registration as a psychologist under this provision but was denied due to alleged insufficient work experience and failure to update her professional education. Despite several appeals to both the Professional Regulatory Board of Psychology (BOP) and the Professional Regulation Commission (PRC), Soberejuanite-Flores's application was rejected. The appeal noted discrepancies in recognizing her work experience and questioned the additional requirement of completing 100 hours of updating workshops and training programs as stipulated in the Implementing Rules and Regulations (IRR) of RA No. 10029, claiming it was unconstitutional. The Court of Appeals upheld the PRC and BOP's decision, prompting Soberejuanite-Flores to elevate the case to the Supreme Court.

Issues:

1. Whether the requirement of completing at least 100 hours of updating workshops and training programs as per the IRR of RA No. 10029 is constitutional.
2. Whether Soberejuanite-Flores was unjustly denied registration as a psychologist under the "grandfather clause" of RA No. 10029.

Court's Decision:

The Supreme Court dismissed Soberejuanite-Flores's petition for lack of merit, affirming the Court of Appeals' decision. The Court ruled that:

1. The IRR's provision on the completion of 100 hours of updating workshops and training programs was a valid exercise of legislative delegated power, adhering to both the completeness test and the sufficient standard test, thus constitutionally sound. The imposition of such requirements is within the regulatory discretion of the Professional Regulatory Board under the umbrella of protecting public welfare.
2. Soberejuanite-Flores did not meet the exemption criteria. Particularly, she failed to substantiate her claim of having met the requisite work experience and upgrade in professional education as mandated by the law and its IRR.

Doctrine:

This case reaffirms the principles of the validity of delegated legislation and the power of administrative agencies to issue rules and regulations for implementing laws, provided these adhere to the standards of completeness and sufficiency.

Class Notes:

- The principle of non-delegation of powers adheres to providing adequate standards to guide the discretion of agencies vested with regulation.
- The completeness test and sufficient standard test are crucial in assessing the validity of delegated legislation.
- The judicial system upholds administrative discretion in professional regulation, emphasizing public welfare over individual interests.

Historical Background:

The enactment of Republic Act No. 10029 or the Philippine Psychology Act of 2009 marked a significant legislative move to regulate the practice of psychology in the Philippines. Aimed at ensuring only competent professionals provide psychological services, the law tasked the Professional Regulation Commission with overseeing licensure examinations. However, recognizing the existence of seasoned psychologists who have been practicing prior to the law's effectivity, a "grandfather clause" was provided for exemption under specific criteria, setting a precedent in the professional regulation landscape of the Philippines.