

### Title:

**\*\*Aida D. Eugenio vs. Civil Service Commission: The Case on the Abolition of the Career Executive Service Board\*\***

### Facts:

Petitioner Aida D. Eugenio, Deputy Director of the Philippine Nuclear Research Institute, aimed for a Career Executive Service (CES) Eligibility and a CESO rank. Granted CES eligibility on August 2, 1993, and recommended for a CESO rank by the Career Executive Service Board (CESB) on September 15, 1993, she faced a setback when the Civil Service Commission (CSC) issued Resolution No. 93-4359 on October 1, 1993. This resolution effectively abolished the CESB, transitioning its personnel and functions to the newly created Office for Career Executive Service under the CSC. This move directly impeded Eugenio's CESO rank appointment. After an advisory from the Chief Presidential Legal Counsel, she pursued judicial relief, contesting the CSC's authority to abolish the CESB and the legality of its budget reallocations through Resolution No. 93-4359.

### Issues:

1. Whether the CSC has the constitutional and statutory authority to abolish the CESB.
2. Whether the budget reallocation by the CSC through Resolution No. 93-4359 is constitutionally valid.
3. The effect of the CESB's abolition on the petitioner's pending CESO rank appointment.

### Court's Decision:

The Supreme Court sided with Eugenio, nullifying CSC's Resolution No. 93-4359. The Court held that:

1. **\*\*Abolition of the CESB\*\***: The CESB, created via Presidential Decree, could only be abolished or modified by legislative action, a power beyond the CSC's reach as delineated in the Administrative Code of 1987. The Court emphasized that the CSC's reorganization authority was confined to offices within its structural jurisdiction, a category the CESB did not fall into given its autonomous nature.
2. **\*\*Budget Reallocation\*\***: The Court implicitly invalidated the fiscal maneuvers accompanying the CESB's dissolution, building on the principle that such structural and budgetary shifts demand legislative sanction.
3. **\*\*Petitioner's Appointment\*\***: While not directly addressing this in the relief rendered, the Court's annulment of the resolution nullifying the CESB reinstates the status quo ante, presumably reviving Eugenio's CESO rank candidacy as initially recommended.

### Doctrine:

This case reinforces the doctrine that the abolition of public offices created by law is a legislative prerogative, underlining the principle of separation of powers. Furthermore, it clarifies the limited scope of reorganization authority vested in bodies like the CSC, emphasizing respect for legislative intent unless expressly empowered to deviate.

### Class Notes:

- **Legal Authority**: Government bodies cannot unilaterally abolish or reorganize entities created by law without legislative consent (See: Administrative Code of 1987).
- **Separation of Powers**: Reorganization and abolition of public offices fall within the legislative domain, highlighting the distinction and balance between legislative creation and executive administration.
- **Autonomy of Attached Agencies**: The attachment of an agency to a department for policy and program coordination does not confer the department authority to abolish the attached agency (Refer to Section 38(3), Chapter 7, Book IV of the Administrative Code of 1987).

### Historical Background:

This case emerged during a period of active governmental reorganization, reflecting tensions between the prerogatives of administrative efficiency driven by the executive branch and the statutory and constitutional mandates that delineate the powers and limits of governmental agencies. The CSC's move to absorb the CESB functions was a notable instance of executive reinterpretation of reorganization authority, prompting judicial clarification on the scope of administrative autonomy and legislative prerogative.