

Title: Peralta vs. Court of Appeals and The Ombudsman

Facts:

Israel G. Peralta, Director/Officer-in-Charge of the Parole and Probation Administration (PPA) Regional Office No. XII in Cotabato City, faced allegations of abuse of authority against Nida Olegario, a Budget Officer I in the same office. The issue emerged in 1993 when PPA's central office incorrectly notified the DBM that Olegario's position was vacant, leading to a halt in salary allotments. Peralta paid Olegario's salary from office savings and unsuccessfully sought rectification from the DBM.

In 1995, citing budget constraints, Peralta ordered Olegario and another employee to cease duties and go on leave. This prompted Olegario to seek clarification from the Civil Service Commission (CSC), which found Peralta's actions illegal and instructed him to desist, advice he disregarded. Following his continued non-compliance, Olegario lodged a complaint with the Ombudsman, and after preliminary investigations, Peralta was preventively suspended and eventually found guilty of abuse of authority, receiving a one-year suspension.

Peralta sought redress through a petition for certiorari, which was initially directed to the Supreme Court but subsequently referred to the Court of Appeals (CA) in adherence to procedural norms. The CA dismissed Peralta's petition, and his motion for reconsideration was likewise denied, leading to the present petition for review before the Supreme Court.

Issues:

1. Whether the authority of the CSC Regional Office extends to binding directives over government office heads regarding personnel management.
2. The determination of bad faith in Peralta's actions against Olegario.
3. The validity of the Ombudsman's decision suspending Peralta for abuse of authority.

Court's Decision:

1. **CSC Authority**: The Supreme Court held that the CSC Regional Office possesses the authority to issue opinions and rulings on personnel management issues within its jurisdiction, binding upon government agencies and officials. This authority is integral to enforcing civil service laws and standards effectively.
2. **Bad Faith**: The Court found Peralta to have acted in bad faith. His disregard for the CSC's directives, despite being informed of the illegality of his order and possessing knowledge of the release of cash allotments for Olegario's salary, was seen as a deliberate and unjustified refusal to obey legal advice. Given these circumstances, Peralta's actions

were not in good faith.

3. **Ombudsman's Decision**: The Supreme Court upheld the Ombudsman's decision, affirming the CA's findings. Peralta's petition was denied, and his suspension for abuse of authority was justified. However, the decision was modified to make Peralta personally liable for Olegario's back salaries from the period of her barred work until her reinstatement.

Doctrine:

The ruling underscores the authority of the Civil Service Commission Regional Offices to enforce civil service laws and issue binding opinions on personnel management within their jurisdiction. It also elucidates the definition of action taken in "bad faith," associating it with a deliberate intent to do wrong against the bounds of duty and legal advice.

Class Notes:

- **Authority of CSC Regional Offices**: Empowered to issue binding rulings on personnel management issues that government agencies and officials must adhere to.
- **Definition of Bad Faith**: Involves a deliberate or intentional wrong, dishonesty, or moral obliquity, transcending mere negligence or poor judgment.
- **Liability for Back Salaries**: Public officials found to have acted in bad faith or personal malice in preventing an employee from working can be held personally liable for the employee's back salary.

Historical Background:

This case provides an illustration of the complexities surrounding the administration of the civil service in the Philippines, particularly in resolving disputes between government employees and their superiors. It emphasizes the role of the Civil Service Commission in ensuring lawful personnel management practices within the state bureaucracy and the accountability mechanisms in place for those in authority who abuse their power.