

Title:

Lupo L. Lupangco, et al. vs. Professional Regulation Commission

Facts:

The Professional Regulation Commission (PRC), in its effort to preserve the integrity of licensure examinations, issued Resolution No. 105 on October 6, 1986, prohibiting examinees from attending any review classes, receiving review material, or any form of assistance from educational or review centers three days prior to examination dates. On October 16, 1986, Lupo Lupangco and other petitioners, all prospective examinees for the accountancy licensure examination, filed a complaint for injunction against the PRC's resolution with the Regional Trial Court of Manila, Branch XXXII, arguing the resolution's unconstitutionality. The PRC countered, claiming the court had no jurisdiction over its administrative act. The Regional Court dismissed PRC's claim, asserting jurisdiction and enjoining the PRC from enforcing the resolution. Dissatisfied, the PRC appealed to the Court of Appeals, which sided with the PRC by nullifying the Regional Court's order, deeming it lacked jurisdiction over the PRC, considered a co-equal body.

Issues:

1. Whether the Professional Regulation Commission (PRC) and the Regional Trial Court are co-equal bodies such that the latter cannot review administrative acts of the former.
2. Whether the PRC's prohibition on examinees attending review classes or receiving materials days before an examination is lawful.
3. The constitutionality of PRC's Resolution No. 105.

Court's Decision:

The Supreme Court ruled in favor of the petitioners, reversing the Court of Appeals' decision. It established that:

1. The Regional Trial Court has the jurisdiction to review the actions of the PRC, as there is no law explicitly making PRC's decisions immune from judicial review (unlike with the Securities and Exchange Commission).
2. The prohibition imposed by the PRC through Resolution No. 105 was found to be unreasonable, arbitrary, and violative of the constitutional rights to liberty and academic freedom, as it unduly restricted the examinees' and educational institutions' means of preparing for licensure examinations.

Doctrine:

- Administrative regulations must be reasonable and show a clear relationship to the goal

they intend to achieve; otherwise, they may be declared invalid.

- The right to academic freedom involves the freedom of individuals and institutions to pursue knowledge and education in a manner they deem most effective.
- The Regional Trial Court has jurisdiction over acts of administrative bodies like the PRC, especially when such acts are challenged on constitutional grounds.

Class Notes:

- Jurisdiction: The Regional Trial Court can review administrative actions, including those by the PRC, unless specific legislation exempts such actions from judicial review.
- Administrative Regulations: Must be reasonable, non-arbitrary, and constitutionally compliant.
- Academic Freedom: Individuals and institutions have the right to engage in educational activities in the manner they see fit, provided it does not infringe on others' rights or violate laws.
- Right to Liberty: Includes the freedom to pursue one's learning and career aspirations without undue interference from regulatory bodies, so long as such pursuits are lawful.

Historical Background:

This case arose during a period of heightened sensitivity to the integrity of licensure examinations in the Philippines. The ruling emphasized the balance between the necessity of maintaining examination integrity and upholding the fundamental rights of individuals and educational institutions. It underscores the judiciary's role in checking administrative actions and ensuring they conform to constitutional mandates.