

Title: Manalo vs. Roldan-Confesor, et al.

Facts:

Vicente and Gloria Manalo sought employment opportunities abroad and ended up dealing with Career Planners Specialists International, Inc. (CPSI), managed by the spouses Victor and Elnora Fernandez. The Manalos were offered jobs in Saudi Arabia for a monthly salary of US\$350.00 each. They were asked to pay a placement fee of P40,000.00 but managed to provide only P30,000.00, with the remaining balance covered by a promissory note. Contrary to expectations, Gloria Manalo was employed as domestic help instead of a tutor, leading both to resign and return to the Philippines shortly after due to unsatisfactory working conditions.

The Manalos filed a complaint with the POEA against the respondents, citing illegal exaction, false advertisement, and various violations of recruitment regulations. Their demands included a refund of the amount paid, moral damages, and administrative sanctions against the respondents.

The POEA initially ordered CPSI to refund the Manalos and imposed a suspension, which was resolved following a reconsideration request, effectively absolving CPSI from alleged violations. This resolution was affirmed by Undersecretary of Labor Ma. Nieves Roldan-Confesor upon appeal.

Issues:

1. Whether POEA committed a jurisdictional error by resolving the motion for reconsideration.
2. Whether petitioners' lack of raising jurisdictional issues at the administrative level precludes them from doing so before the Supreme Court.
3. Whether the requirement of clear and convincing evidence to establish illegal exaction constitutes a violation of administrative due process.

Court's Decision:

The Supreme Court granted the petition, reinstating the original POEA order for CPSI to refund the Manalos. It ruled that there was no jurisdictional error in the POEA's reconsideration of its decision, as motions for reconsideration in cases affecting suspension, revocation, or cancellation of authority are within the POEA's purview. The Court also addressed the issue of substantial evidence, clarifying that only such evidence, not clear and convincing proof, is required in administrative proceedings. Lastly, the Court found the

respondents liable for illegal exaction considering the evidence provided.

Doctrine:

In administrative proceedings related to the cancellation, suspension, or revocation of licenses or authority for recruitment, substantial evidence is the required standard of proof, not clear and convincing evidence. The process adheres to the principle that administrative determinations need only be based on evidence that a reasonable mind might accept as adequate to support a conclusion.

Class Notes:

- **Substantial Evidence**: The level of proof required in administrative cases, defined as “more than a mere scintilla but may be somewhat less than a preponderance”.
- **Jurisdiction in Administrative Proceedings**: The body or office (like POEA) handling the complaint initially has the authority to resolve motions for reconsideration unless specific rules direct otherwise.
- **Administrative Due Process**: Requires only substantial evidence in determining cases of illegal exaction or recruitment violations.
- Relevant provisions include Article 34, Paragraph of P.D. 442 (Labor Code) regarding allowable fees and the rules governing the collection of fees by recruitment agencies (Sec. 2, Rule VI, Book II, 1985 POEA Rules and Regulations).

Historical Background:

The case reflects the Philippines’ broader struggle with issues of illegal recruitment and the protection of overseas workers. It underscores the necessity of vigilant regulatory oversight by bodies like the POEA and consistent judicial scrutiny to protect the rights and welfare of Filipino workers abroad.