

****Title:**** Valmores v. Achacoso

****Facts:**** Denmark S. Valmores, a Seventh-day Adventist and a first-year student at the Mindanao State University (MSU)-College of Medicine, filed a petition for mandamus against Dr. Cristina Achacoso, Dean of the College of Medicine, and Dr. Giovanni Cabildo, faculty member, following their refusal to excuse him from classes and examinations held on Saturdays due to his religious beliefs. Valmores had previously requested accommodations to observe his Sabbath from sunset Friday to sunset Saturday, a practice fundamental to Seventh-day Adventists. Despite submitting a certification from his church and elevating the issue to the CHED and MSU's president, who directed Achacoso to comply with a 2010 CHED Memorandum on religious obligations, his requests were denied, leading to his receiving a failing grade and being ineligible to retake an examination.

****Procedural Posture:**** The escalation of Valmores' requests involved direct communication with the respondents, submissions of church certifications, and a request for intervention by the CHED and the President of MSU, culminating in a petition for mandamus under Rule 65 of the Rules of Court filed with the Supreme Court due to the denial of his constitutional right to freedom of religion.

****Issues:**** The central legal issue was whether mandamus could compel the respondents to enforce the 2010 CHED Memorandum, thereby accommodating Valmores' religious practices in his academic schedule.

****Court's Decision:**** The Supreme Court ruled in favor of Valmores, granting the petition for mandamus. The Court emphasized the ministerial duty of the respondents to enforce the CHED Memorandum, which was mandated without regard to the discretionary academic policies of the institution. It affirmed Valmores' constitutional right to the free exercise of his religion and directed the respondents to make accommodations for his Sabbath observance.

****Doctrine:**** This case reiterated the doctrine that the right to freedom of religion is protected under the Constitution, and educational institutions have a ministerial duty to make accommodations for the religious practices of students, as outlined in government memorandums, such as the 2010 CHED Memorandum.

****Class Notes:****

- Fundamental religious beliefs are protected under the Philippine Constitution.
- Mandamus can compel the performance of a ministerial duty, not dependent on the

discretion of the performing party.

- CHED Memorandums are binding on educational institutions regarding the accommodation of religious practices.
- Academic institutions must balance academic freedom with constitutional rights, including religious freedom.

****Historical Background:**** This case reflects the evolving understanding and application of religious freedom in the context of Philippine education systems. It underscores the tension between institutional autonomy and adherence to overriding constitutional rights, illustrating the judiciary's role in mediating such conflicts.