

Title:

****Professional Regulation Commission vs. Dayamon Didato Alo: A Legal Examination of Professional Regulation and the Scope of Appellate Jurisdiction****

Facts:

This case arose when Dayamon Didato Alo was formally charged by the Board for Professional Teachers, under the Professional Regulation Commission (PRC), on July 5, 2011, for unprofessional and/or dishonorable conduct purportedly by using a falsified Board Resolution No. 671 dated September 28, 2000, for her registration as a professional teacher on September 14, 2007. Alo defended herself by denying knowledge of the falsified document and asserted her qualifications under RA 7836 which allowed certain teachers to obtain a license without passing the board exam. Despite this, the Board revoked her certification and license. Alo then bypassed the PRC and directly filed a petition for review with the CA under Rule 43, which granted her petition, reversing the Board's decision.

Issues:

1. Whether the CA has jurisdiction to directly review the Board's decision concerning the PRC.
2. Whether the Board rightly found Alo guilty of falsification thereby revoking her certificate of registration and professional license.

Court's Decision:

1. ****Jurisdiction of the CA****: The Supreme Court held the CA has jurisdiction over the case as Section 9 of BP 129 as amended by RA 7902 and Rule 43 of the Rules of Court grant the CA appellate jurisdiction over final judgments of quasi-judicial agencies, including professional regulatory boards. The securities of jurisdiction based are clear on law, and no exclusive appellate jurisdiction was granted to the PRC over decisions of its boards, placing such decisions within the scope of CA's review.
2. ****Exhaustion of Administrative Remedies****: The Court found that Alo failed to exhaust all administrative remedies by not filing an appeal with the PRC, a procedural misstep that should have led to the dismissal of her CA petition for lacking cause of action.
3. ****Alo's Qualification****: On merits, the Court stated Alo was not qualified under RA 7836 to obtain a professional teaching license without examination, mainly because she applied beyond the prescriptive period stipulated in the law and relevant resolutions.

4. **Due Process**: The Court determined Alo's due process was not violated. The CA erred in holding Alo's right to due process was infringed upon when the Board found she wasn't qualified under Section 26 of RA 7836 since the issue of her qualification was raised by Alo herself.

Ultimately, the Supreme Court granted the petition, reversing and setting aside the CA's decisions, and reinstating the Board's initial decision that revoked Alo's teaching license and certificate of registration.

Doctrine:

This case reiterates the doctrine of exhaustion of administrative remedies, emphasizing that parties must first follow through administrative channels before resorting to judicial intervention. Additionally, it underscores the jurisdictional capacity of the CA over decisions of quasi-judicial bodies like professional regulatory boards.

Class Notes:

- **Exhaustion of Administrative Remedies**: Before seeking judicial intervention, all administrative avenues for resolving a dispute must be pursued.
- **Quasi-Judicial Jurisdiction of the CA**: Under BP 129 as amended by RA 7902 alongside Rule 43, the CA maintains appellate jurisdiction over decisions of quasi-judicial agencies, barring exclusive exceptions.
- **RA 7836 and PRC Resolution Parameters**: Key statutory and regulatory parameters dictate the qualifications and procedures for professional teacher certification in the Philippines.
- **Due Process in Administrative Proceedings**: Entails the right to be heard, including presenting one's case and evidence, and receiving a decision based on substantial evidence.

Historical Background:

The establishment of professional regulation in the Philippines, embodied in laws such as RA 7836 (Teachers' Professionalization Act of 1994) and the overseeing role of the Professional Regulation Commission, underpins this case. The historical context of licensing professional teachers illustrates the evolving standards and regulatory mechanisms aiming to ensure quality education through qualified educators.