

Title: Ampong vs. Civil Service Commission

Facts:

On November 10, 1991, during the Professional Board Examination for Teachers (PBET) in Davao City, Sarah P. Ampong impersonated Evelyn Junio-Decir, taking the exam on her behalf and subsequently passing. At the time, both were employed as public school teachers under the Department of Education, Culture and Sports (DECS). Ampong later transferred to the judiciary as a Court Interpreter III at the Regional Trial Court in Alabel, Sarangani Province, on August 3, 1993.

The Civil Service Regional Office No. XI (CSRO) discovered the impersonation on July 5, 1994, when “Decir” appeared to claim her PBET Certificate of Eligibility, but the photo and signatures didn’t match the examination records. A preliminary investigation identified Ampong as the impersonator and initiated formal charges against both for Dishonesty, Grave Misconduct, and Conduct Prejudicial to the Best Interest of the Service.

Ampong confessed to the wrongdoing in February and March 1995, waiving her right to counsel, and was subsequently dismissed from service by the CSC on March 21, 1996. Ampong challenged the CSC’s jurisdiction, arguing it lay with the Supreme Court given her judicial position. The CSC and later the Court of Appeals (CA) rejected her arguments, the latter under the principle of estoppel due to her active participation in CSC’s proceedings.

Issues:

1. Whether the Civil Service Commission (CSC) has jurisdiction to discipline a judicial employee for acts committed prior to joining the judiciary.
2. Application of the principle of estoppel against Ampong’s challenge to CSC jurisdiction.

Court’s Decision:

The Supreme Court ruled against Ampong, holding that while generally, the CSC has jurisdiction over civil service employees and the Supreme Court oversees judiciary employees, in this case, Ampong was estopped from challenging CSC’s jurisdiction. Her voluntary participation in the proceedings and admission of guilt ratified CSC’s jurisdiction over her actions as a then-teacher. However, the Court noted that proper procedure would typically require the CSC to file charges with the Office of the Court Administrator given Ampong’s judicial position at the time of the institution of action.

Doctrine:

1. ****Jurisdiction over Civil Service Employees****: The Civil Service Commission (CSC) has

jurisdiction over civil service employees, but administrative supervision over judiciary employees lies exclusively with the Supreme Court.

2. **Principle of Estoppel in Administrative Proceedings**: A party may not be allowed to challenge the jurisdiction of a tribunal or body in administrative proceedings if they have actively participated in those proceedings and have sought to obtain a favorable decision from the body.

Class Notes:

- **Jurisdiction at Time of Action vs. Time of Offense**: The jurisdiction over a case is determined at the time of the institution of the action, not at the time of commission of the offense.
- **Estoppel and Participation in Proceedings**: Active participation in proceedings before a tribunal can estop a party from later contesting its jurisdiction.
- **Dishonesty in Civil Service Examinations**: Acts of cheating, collusion, impersonation, or assisting in such acts constitute dishonesty, a ground for disciplinary action including dismissal.

Historical Background:

The case underscores the delineation of jurisdiction between the CSC and the Supreme Court over disciplinary actions within the Philippine government's branches, highlighting the evolving interpretation of jurisdictional boundaries and principles of estoppel in administrative law. This decision reaffirms the exclusive authority of the Supreme Court over judiciary employees while recognizing the CSC's broad jurisdiction over civil service examination integrity.