

Title

****Atty. Riza S. Fernandez vs. Willie Fernando Maaliw****

****G.R. No. 2016-02145 [Philippines Supreme Court, Second Division], 2022****

Facts

- ****September 28, 1999:**** Willie Fernando Maaliw filed a complaint against his co-employee Danilo Longasa for grave misconduct, oppression, dishonesty, negligence, and violations of RA 6713 and the Civil Service Law.
- ****January 21, 2000:**** Longasa submitted an affidavit and the complaint was submitted for decision.
- ****June 16, 2014:**** After over 14 years, the CSC-NCR rendered a decision dismissing Maaliw's complaint for being insufficient in form, signed by Director Lydia Castillo and prepared by Atty. Riza S. Fernandez.
- ****November 9, 2015:**** Due to the delay, Maaliw filed a complaint against Lydia Castillo and Atty. Fernandez for neglect of duty and violation of RA 6713, initially filed with the Office of the Ombudsman and referred to the CSC.
- ****December 23, 2015:**** Castillo and Fernandez denied liability, claiming the case was pending before they assumed their positions at CSC-NCR and cited the office's case backlog and limited personnel.
- ****August 31, 2016:**** The CSC dismissed Maaliw's complaint against Fernandez and Castillo, recognizing the delay but attributing it to the institutional problem rather than individual neglect.
- ****December 16, 2016:**** Maaliw's motion for reconsideration was denied by the CSC.
- ****January 14, 2019:**** The Court of Appeals reversed the CSC's decision, finding Fernandez and Castillo guilty of simple neglect of duty and imposing a fine equivalent to their three months' salary.
- ****Reconsideration:**** Fernandez sought reconsideration, which was denied, and subsequently filed a petition for review with the Supreme Court.

Issues

1. ****Whether the CA erred in giving due course to Maaliw's appeal against the CSC's findings (Appealability and Maaliw's standing).****
2. ****Whether Fernandez's right to due process was violated by the CA in finding her guilty without a Formal Charge (Due process and procedural compliance).****
3. ****Whether Fernandez could be held liable for simple neglect of duty for the delay in resolving Maaliw's complaint against Longasa (Attribution of delay and liability).****

Court's Decision

ISSUE 1: *Appealability and Maaliw's Standing*

The Supreme Court ruled that Maaliw had the appropriate standing to file an appeal against the CSC's decision and that the CSC's decision was indeed appealable to the CA. The reliance on older jurisprudence that limits who can appeal CSC decisions was held outdated. The applicable laws (BP Blg. 129 and Rules of Court) provide that decisions can be appealed by any party, not just those adversely affected.

ISSUE 2: *Due Process and Procedural Compliance*

The Court found that Fernandez was deprived of due process because she was not issued a Formal Charge, which is a requirement under the CSC's Rules on Administrative Cases. The CA should not have ruled on the merits without ensuring that formal procedures were followed. As Fernandez was not given a chance to formally defend herself through proper administrative procedures, her right to a fair hearing was violated.

ISSUE 3: *Attribution of Delay and Liability*

The Supreme Court upheld the CSC's finding that the delay in resolving Maaliw's complaint was attributable to the institutional challenges within the CSC-NCR, such as the high volume of pending cases and limited personnel. The specific delay from when Fernandez assumed office was not found to be culpable. Thus, Fernandez could not be held liable for neglect of duty for the systemic delay.

Decision:

The Supreme Court granted Fernandez's petition, setting aside the CA's decision and reinstating the CSC's decision which dismissed Maaliw's complaint against Fernandez and Castillo.

Doctrine

1. **Appealability:** CSC decisions dismissing a complaint for lack of prima facie case are appealable to the CA under Rule 43 of the Rules of Court.
2. **Due Process in Administrative Proceedings:** The issuance of a Formal Charge is a necessary requirement before an administrative penalty can be imposed.
3. **Institutional vs. Individual Liability:** Delays attributable to systemic issues within an institution do not automatically translate to individual liability for officials unless specific individual neglect can be proven.

Class Notes

****Key Concepts:****

1. ****Appealability of Administrative Decisions:**** Understanding Rules of Court, Rule 43.
2. ****Due Process Requirements:**** Importance of Formal Charge in administrative proceedings (RRACCS Rule 5-6).
3. ****Evaluation of Negligence:**** Distinguishing between institutional and individual liability (Navarro v. COA; Ang Tibay v. CIR).

****Statutory References:****

- ****Republic Act No. 6713:**** Code of Conduct and Ethical Standards for Public Officials and Employees.
- ****Revised Administrative Code of 1987:**** Pertinent sections under Title I, Book V.
- ****BP 129:**** Jurisdiction provisions concerning the Court of Appeals.

Historical Background

This case plays out against the broader context of Philippine efforts to streamline and improve the efficacy of administrative processes while upholding due process of law. The delays in resolving administrative cases reflect systemic challenges faced by institutions like the CSC, including high caseloads and limited personnel, which are critical factors considered in rulings about the right to the speedy disposition of cases. The careful balance between institutional constraints and individual accountability is a recurring theme in Philippine jurisprudence.