

### Title:

Peralta vs. Civil Service Commission, 287 Phil. 471

### Facts:

1. **Employment Appointment and Initial Salary**: On September 25, 1989, Maynard R. Peralta was appointed as a Trade-Specialist II at the Department of Trade and Industry (DTI). His role was labeled as "Reinstatement/Permanent." Prior to this, he was employed at the Philippine Cotton Corporation.
2. **Salary Deductions**: Peralta received his initial salary on December 8, 1989, covering the period from September 25 to October 31, 1989. Due to a lack of accumulated leave credits, DTI deducted from his salary for the days he was absent (September 29-October 1 and October 20-22, 1989), inclusive of weekends.
3. **Inquiry and Response**: On December 15, 1989, Peralta queried Amando T. Alvis, Chief of the General Administrative Service, regarding the legality of the salary deductions. Alvis responded on January 30, 1990, citing Chapter 5.49 of the Handbook of Information on the Philippine Civil Service, which stipulates that leave without pay on a working day results in unpaid Saturdays, Sundays, or holidays that immediately follow or precede that day.
4. **Civil Service Commission Query**: Peralta challenged this rule in a letter to CSC Chairman Patricia A. Sto. Tomas on February 20, 1990, arguing it was an unlawful deprivation of property without due process.
5. **CSC Ruling**: On May 25, 1990, CSC upheld the rule through Resolution No. 90-497, asserting that employees without leave credits would not be paid for intervening non-working days if absent on the preceding working day to deter potential abuse.
6. **Motion for Reconsideration**: Peralta filed a motion for reconsideration, which CSC denied on June 20, 1990, by Resolution No. 90-797.
7. **Supreme Court Petition**: Peralta filed a petition for certiorari with the Supreme Court challenging the validity of the CSC policy.

### Issues:

1. **Validity of the 1965 CSC Policy**: Whether the Civil Service Commission's policy, which dictates salary deductions for non-working days following an absence without pay, aligns with statutory provisions, specifically RA No. 2260 and RA No. 2625.

2. **Deprivation of Property Without Due Process**: Whether the deductions constituted unlawful deprivation of property in violation of Peralta's rights under due process.

### ### Court's Decision:

1. **Validity of the CSC Policy**:

- **CSC's Interpretation**: The CSC interpreted the legislative acts (RA 2625 specifically) and created a policy stipulating that employees who are absent before or after a weekend or holiday without leave credits would not be entitled to salary for those non-working days.

- **Court's Ruling**: The Supreme Court held that the legislative intent of RA 2625 was to benefit government employees by excluding weekends and holidays from leave computations, regardless of leave credits. Therefore, CSC's interpretation was inconsistent with legislative intent.

2. **Deprivation of Property Without Due Process**:

- **Invalid Policy**: The Court declared the CSC policy invalid, as it contradicts the explicit provision in RA 2625 concerning exclusion of weekends and holidays for leave purposes.

- **Restitution**: The Court ordered that Peralta should be paid the unlawfully deducted amounts from his salary.

### ### Doctrine:

The primary doctrine reiterated by the Supreme Court in this case is that legislative intent must prevail and administrative interpretations that contravene this intent are invalid. The principle "Ubi lex non distinguit nec nos distinguere debemus" (where the law does not distinguish, we should not distinguish) was crucial in determining that there is no legal basis to differentiate between employees with or without leave credits regarding the deduction of salary.

### ### Class Notes:

1. **Statutory Interpretation**: Legislative intent is paramount.

2. **Civil Service Rules**: Policies must align with enacted laws.

3. **Due Process**: Property (salary) cannot be deprived without legal justification.

4. **Administrative Policies**: Must be rooted in clear statutory authority.

### **Relevant Statutes**:

- **RA No. 2260**: Civil Service Act of 1959

- **RA No. 2625**: Ensures leave credits exclusive of non-working days without discrimination

### Historical Background:

The case is contextualized during a period of rigorous application of civil service rules and policies, which were being revisited for alignment with statutory mandates. Prior to Peralta's petition, such CSC policies had been followed since 1965 without direct challenge, reflective of a broader administrative inclination towards stringent leave and salary regulations to discourage absenteeism and potential abuse of leave policies.