



RECEIVING COPY
 Quezon City

Dec 2 3 32 PM '15

CERT
 ISO: 9001:2008
 ID: 215030103

CIVIL SERVICES COMMISSION
 NATIONAL CAPITAL REGION
 PUBLIC ASSISTANCE AND LIAISON DIV.
RECEIVED
 DEC 02 2015

25 November 2015

OFFICE OF THE PRES. & CEO

Received By: *DCM*

RECEIVED
 NOV 27 2015
CSE-CD

HON. JUAN B. SANTOS
 Chairman

HON. EMILIO S. DE QUIROS, JR.
 President and Chief Executive Officer (PCEO)

SOCIAL SECURITY SYSTEM (SSS)
 East Avenue, Diliman, Quezon City

RE : SSS RESTRUCTURING PLAN OF BOS AND MSD

pel y. or

Dear Chairman Santos and PCEO De Quiros,

This pertains to the SSS letter dated 25 September 2015¹, requesting to consider the SSS Reorganization of the Branch Operations Sector (BOS) and Medical Services Division (MSD) as '**rationalization**' rather than '**reorganization**'. We understand from your letter that in the course of implementing M.O. No. 2015-09 (Reorganization of the Branch Operations Sector and Medical Division of SSS), SSS was advised by the CSC-NCR Office and Director Claudia A. Tan of the CSC Field Office-SSS that there are significant distinctions between '**reorganization**' and '**rationalization**', as follows:

- (a) Reorganization is covered by R.A. 6656, while rationalization is covered by E.O. No. 366;
- (b) Under reorganization, all positions are deemed vacant, while under a rationalization, there is no need to announce all positions as vacant;
- (c) Under reorganization, reclassification and retitling of positions are not allowed, while under a rationalization, these personnel actions are allowed; and
- (d) Under reorganization, since all positions are deemed vacant, incumbents need to re-apply for their positions, new appointments shall be issued, and the applicants shall be assessed using the SSS Qualification Standards. Meanwhile, under rationalization, incumbents of reclassified positions have a vested right to the reclassified positions.
- (e) CSC will approve the filling up of newly created positions in SSS, if SSS is able to seek approval from GCG to treat its '**reorganization**' as '**rationalization**'.

We understand that the CSC NCR office informed SSS that it will not process any appointments resulting from GCG MO No. 2015-09 until SSS first declares all positions in the branches as vacant, thus hindering the implementation of the MO. Notably, R.A. No. 6656 does not expressly mention any limitations as to retitling, reclassification or filling up of positions, nor does it make any mention of all positions in an agency being declared as vacant. Even the Implementing Rules and Regulations (IRR) of R.A. No. 6656 issued by CSC does not expressly require that in a reorganization, all positions must first be declared as vacant. We understand that the practice of declaring all positions as vacant under a reorganization were adopted by the implementing agencies based on conditions that existed when R.A. No. 6656 was enacted in 1988.

¹ Officially received by the Governance Commission on 29 September 2015