

THE TRIO MISUSED OBSOLETE AND IRRELEVANT TESTS

191. The Trio members claimed that elementary school teachers have above average intelligence. For example, Dr. Westcott wrote (CFW237):

... Multiple researchers have reported teachers demonstrate FSIQ far exceeding Ms. [REDACTED] demonstrated abilities. Schmidt and Hunter (2004) indicated that the average IQ for teachers is 122....

192. Dr. Westcott's statement is falsehood, fantasy, or delusion. As detailed above, Schmidt and Hunter (2004) never demonstrated that "the average IQ for teachers is 122". At best, the "researchers" conducting research 80+ years ago demonstrated that some teachers' scores on GCT was 122.8 (GCT scores are not IQ scores).
193. The Trio in fact relied on "multiple sources" of teacher data but **all such sources were astonishingly obsolete and irrelevant.**

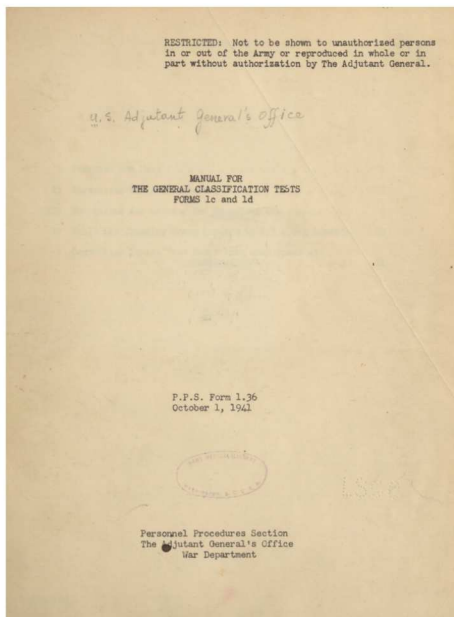
The Trio misused obsolete US Army General Classification Test (GCT) "teacher" data

194. The Trio reproduced the Table 1 (below) from Schmidt and Hunter (2004) to claim that "mean intelligence for teachers (measured with the military's General Classification Test) was 122.8 with standard deviation of 12.8..." (CFW154).

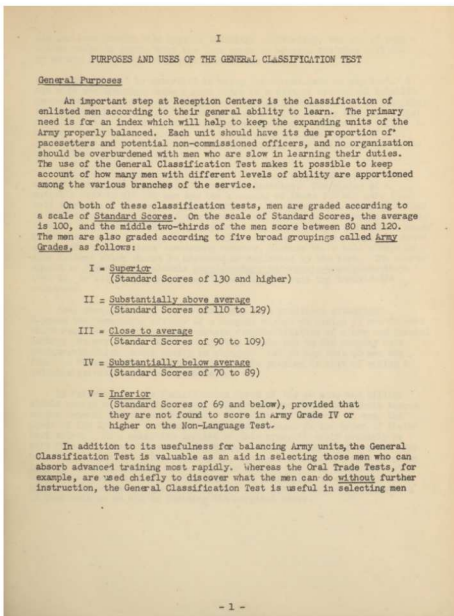
Table 1
Mean GCT Standard Scores, Standard Deviations, and Range of Scores of 18,782 AAF White Enlisted Men by Civilian Occupation (From Harrell & Harrell, 1945, pp. 231-232)

Occupation	N	M	Mdn	SD	Range
Accountant	172	128.1	128.1	11.7	94-157
Lawyer	94	127.6	126.8	10.9	96-157
Engineer	39	126.6	125.8	11.7	100-151
Public-relations man	42	126.0	125.5	11.4	100-149
Auditor	62	125.9	125.5	11.2	98-151
Chemist	21	124.8	124.5	13.8	102-153
Reporter	45	124.5	125.7	11.7	100-157
Chief clerk	165	124.2	124.5	11.7	88-153
Teacher	256	122.8	123.7	12.8	76-155
Draftsman	153	122.0	121.7	12.8	74-155
Stenographer	147	121.0	121.4	12.5	66-151
Pharmacist	58	120.5	124.0	15.2	76-149
Tabulating-machine operator	140	120.1	119.8	13.3	80-151
Bookkeeper	272	120.0	119.7	13.1	70-157
Manager, sales	42	119.0	120.7	11.5	90-137
Purchasing agent	98	118.7	119.2	12.9	82-153
Manager, production	34	118.1	117.0	16.0	82-153
Photographer	95	117.6	119.8	13.9	66-147

195. Schmidt and Hunger (2004) **merely reproduced** “Mean GCT [Army General Classification Test], Standard Deviations, and Ranges of 18,782 AAF [Army Air Force] White Enlisted Men by Civilian Occupation” from “Harrell & Harrell, 1945, pp. 231-232” in their Table 1.
196. Notably, Schmidt and Hunter (2004) say exactly nothing about GCT; they do not mention how it was normed, they do not say who the teachers in Table 1 reproduced from Harrell and Harrell (1945) were (except that they were “AAF White Enlisted Men”); they do not say what the mean and SD of the GCT was; they only reproduced Table 1 from Harrell and Harrell (1945) in their article. As expected, Schmidt and Hunter (2004) are clear that they copied their Table 1 from Harrell and Harrell’s (1945).
197. **The US Army General Classification Test (GCT)** was normed prior to 1941 and the Manual For The General Classification Tests (US Adjutant General’s Office, 1941) was published in 1941, two years after the World War II started 80+ years ago. The manual is freely accessible at <https://collections.nlm.nih.gov/ext/dw/14030550R/PDF/14030550R.pdf>
198. The title page of the GCT Manual is below. It looks appropriately old; it is typewritten and it has distinct yellowish/oldish paper tint corresponding to its 80+ years advanced/ancient age. If the Trio actually located this manual (which is unlikely as the Trio appears completely oblivious to the CGT’s age and standardization), the Trio could not miss its advanced age.



199. The figure below shows the page from the GCT Manual explaining the GCT standardization. It says that "On the scale of [GCT] Standard Scores, the average is 100, and the middle two-thirds of the men score between 80 and 120." In other words, the GCT has mean of 100 and standard deviation (SD) of 20, just like the GATB CDN, but unlike Wechsler tests that were standardized using IQ scale with the mean of 100 and SD of 15.



200. The GCT has 150 questions and examinees are allowed 40 minutes. There is a penalty for incorrect answers.

201. The items are focused on what US Army thought was relevant. Here are some example questions from the GCT:

The soldier's HABILIMENTS were in good order.

- (a) papers (b) letters (c) books (d) clothes

How many cartridges does a rifleman have in each pile if he sorts 228 cartridges into 3 equal piles?

- (a) 76 (b) 57 (c) 684 (d) 77

The man was MANACLED and taken to the guardhouse.

- (a) captured (b) questioned (c) handcuffed (d) rebuked

The cost to the Army of installing a new windowpane is 75 cents. If the glass costs 23 cents and the putty 2 cents, how much does the time and labor of the glazier cost?

- (a) 35 cents (b) 50 cents (c) 40 cents (d) 25 cents

202. Harrell and Harrell (1945) do not describe the "Teachers" except to say that they reported on "white enlisted men of the Army Air Forces Air Service Command distributed according to their previous civilian occupation." Harrell and Harrell (1945) also say that "The job titles [such as "Teachers"] in the following tables [including Table 1] are those given and described in [US] Army Regulation 615-26." US Army Regulation 615-26 does not appear to be available online but it is available in US National Archives.
203. Obviously, Harrell and Harrell (1945) sample of "AAF White Men" tested during the World War II (on average in 1942):
- (a) did not have an IQ of 122.8 because CGT standards scores have mean of 100 and SD of 20 – the sample mean IQ scale score was only 117.1
- (b) is not representative of teachers in early 1940s in USA nor Canada
- (c) is not representative of Canadian teachers in 2010 nor today
- (d) is not representative of teachers employed by the SD5 in 2010 nor today
- (e) is 80 years obsolete and irrelevant given massive changes in the society
- (f) would have mean IQ of approximately 97 IQ if assessed with WAIS-IV (2008) normed in 2007 (e.g., $(2007 - 1940) \times 0.3 = 67 \times 0.3 = 20.1$)
204. To state the obvious, these "AAF White Men" were not Ms. [REDACTED] peers.
205. Equally notably, the GCT scores were never linked to WAIS-IV CDN (2008).
206. The Trio never even mention nor consider any of the facts above in their various reports; they are or pretend to be completely oblivious to these facts.

The Trio misused obsolete WAIS (1955)/Wonderlic (1992) "teacher" data

207. The Trio reproduced and relied on the figure below from Gottfredson (2003) and claimed that the figure "shows that on average teachers' general cognitive ability is above average, estimated at the 81st percentile and equivalent to an IQ score of 113." The figure was also published five years earlier by Gottfredson (1997).
208. The figure and its caption make it clear that the reported data
- (a) were sourced from Wonderlic (1992)
- (b) were WAIS (1955) IQs equivalent (i.e., norms established 56 years prior to 2010) derived from Wonderlic Personnel Test (WPT) scores.
209. The source for Gottfredson (2003) data, Table 3 (reproduced below) from Wonderlic (1992), makes it clear that the data Gottfredson reproduced were based on unknown sample of 500 unspecified teachers, tested in only 10 "companies reporting". Nothing else is reported about these teachers; we do not know if they were elementary school teachers, secondary school teachers, college teachers, etc..

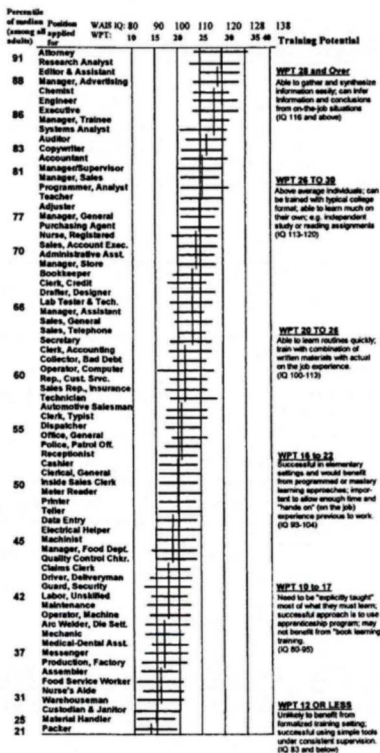


Figure 15.1: Wonderlic Personnel Test (WPT) scores by position applied for (1992). The bold horizontal line shows the range between the 25th and 75th percentiles. The bold crossmark shows the 50th percentile (median) of applicants to that job. Source: Wonderlic (1992: 20, 26, 27). Reprinted by permission of the publisher.

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210. The teacher sample had mean WPT of 26.01 and mode of WPT 24.

TABLE 3: TEST SCORES BY POSITION APPLIED FOR SUMMARY (1992 NORMS)

Position Applied for	No. of Companies Reporting	WPT Score							Arith. Avg.	Mode	Std. Dev.	
		10	15	20	25	30	35	40				
Attorney	7								18	23.67	16	6.95
Research Analyst	6								13	27.92	14	7.88
Editor & Assistant	12								116	28.84	30	5.56
Manager, Advertising	16								165	28.36	28	5.25
Chemist	12								61	27.85	30	6.28
Engineer	33								215	28.96	27	6.89
Executive	46								361	28.70	28	6.02
Manager, Trainee	20								5,586	28.18	28	5.85
Systems Analyst	12								33	27.52	31	6.12
Auditor	16								198	26.93	25	5.60
Copywriter	5								116	26.88	28	5.86
Accountant	48								503	25.86	26	6.07
Manager/Supervisor	73								446	25.59	22	6.24
Manager, Sales	48								380	25.45	27	5.72
Programmer, Analyst	59								979	26.42	25	6.71
Teacher	10								500	26.01	24	6.51
Adjuster	7								150	25.24	25	6.14
Manager, General	43								456	24.63	24	5.80
Purchasing Agent	33								404	24.94	24	5.71
Nurse, Registered	14								116	24.63	24	5.80

211. The table below, reproduced from Wonderlic (1992), which in turn is reproduced from Dodrill (1981) (see Table 1 p. 659), shows the translation from WPT to WAIS (1955) FSIQs. It states that WPT of 26 is comparable to WAIS (1955) FSIQ of 113.

Wonderlic, WAIS, GATB Test Score Comparison					
Wonderlic Age Corrected Score	WAIS* Full Scale I.Q.	GATB** Aptitude 'G'	Wonderlic Age Corrected Score	WAIS* Full Scale I.Q.	GATB** Aptitude 'G'
1	59		23	106	
2	61		24	108	105
3	64		25	111	
4	67		26	113	110
5	69		27	114	
6	71		28	116	115
7	73		29	118	
8	75	65	30	120	120
9	78		31	121	
10	80	70	32	123	125
11	81		33	125	
12	83	75	34	126	130
13	86		35	128	
14	88	80	36	130	
15	90		37	132	
16	93	85	38	134	
17	95		39	136	
18	97	90	40	138	
19	98		41	140	
20	100	95	42	142	
21	102		43	143	
22	104	100	44	146	

many of the more common predictors used in pre-employment and admissions selection decisions. This cumulated research was summarized by Hunter and Hunter (1984) in the table above.

* Dodrill, 1981
 ** McCormick, Mechem & Jeannert, 1989

212. Gottfredson (2003) used this translation table, originally provided by Dodrill (1981), to translate WPT scores to WAIS (1955) IQ scores as is plainly shown at the top of the figure extracted from Gottfredson (2003).

213. **Obviously**, Gottfredson's (2003) sample of teachers:
- (a) is not representative of teachers in USA nor Canada 30 years ago
 - (b) is not representative of Canadian teachers today
 - (c) is not representative of teachers employed by the SD5
 - (d) is 30 years obsolete and irrelevant given massive changes in the society
 - (e) would have mean IQ of approximately 96.1 IQ if assessed with WAIS-IV (2008) normed in 2007 (2007 minus 1954 = 54; 54 years times 0.3 = 15.9)
214. To state the obvious, these teachers were not Ms [REDACTED] peers.
215. Equally notably, the WAIS (1955) and WPT scores were never linked to WAIS-IV CDN (2008). Moreover, the Trio did not mention nor provide any regression equation predicting WAIS-IV CDN (2008) scores from either WAIS (1955) or WPT (1992) scores.

The Trio misused the USES GATB "teacher" data

216. Dr. Westcott's technicians administered the GATB CDN (Nelson, 1986) to Ms [REDACTED]. The GATB CDN was developed because the USES GATB (DOL, 1970) was (a) obsolete, (b) affected by the Flynn Effect, (c) one subtest was inappropriate in Canada, and (d) not appropriate for Canadians. The GATB CDN was normed on almost 1,000 workers in Canada yielding General Working Population norms. No occupation specific norms were ever published for the GATB CDN (Nelson, 1986). Instead, the Trio found a very old USES GATB Section III Manual (US DOL, 1970) and used samples of education students in their final university year in 1950s as "norms" for teachers.
217. The Trio demonstrates astonishing incompetence in misusing the GATB CDN and the USES GATB as if they were identical, current and up-to-date tests.

There are two different GATB tests: USES GATB and GATB CDN

218. There are two very different versions of the GATB.
- (a) There is the United States Employment Services General Aptitude Test Battery ("**USES GATB**") developed and used by the United States Employment Service since 1947 until its use was discontinued. The Manual for the USES GATB comes in four different sections.
 - (b) There is the GATB Canadian Edition ("**GATB CDN**") developed by Human Resources Development Canada ("**HRDC**"), re-normed in 1985, and published by Nelson Canada in 1986 ("**GATB CDN**").
219. The GATB CDN (Nelson, 1986) is an adaptation of USES GATB for Canada, including **substantial** revision of Part 6 (Arithmetic Reasoning) and the 1985 re-norming in Canada. As stated in the GATB CDN Manual:

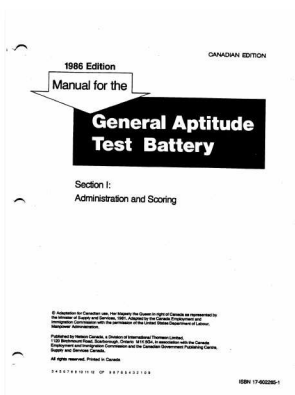
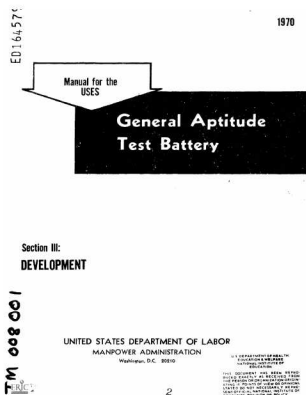
This edition of the GATB Administration and Scoring Manual is the result of revision to Part 6 (Arithmetic Reasoning) and the 1985 re-norming of all pencil-and-paper tests (Parts 1-7). (p. iv)

220. Whereas the USES GATB "general working population [GWP] norms" were established in 1952, the GATB CDN general working population norms were established in 1985, some 33 years after the USES GATB GWP norms. **The GWP norms are NOT population norms** such as those published for, for example, Wechsler Adult Intelligence Scales.

221. **The GATB Interpretive Manual made it clear that the USES GATB and GATB CDN were NOT comparable** and that “one would receive lower standard scores on the 1985 Canadian edition than on the U.S. norms (i.e., what is now known as Flynn Effect):

The administration of a revised GATB [GATB CDN], with a revised Part 6, gave 977 valid responses – a representative sample of the Canadian GWP. This resulted in the need to revise the GWP norms for Forms A and B, Parts 1 to 7, as contained in the GATB manual Section 1: Administration and scoring. As had been expected [back in 1985], average raw scores obtained by the 1985 [Canadian] sample were significantly higher than those obtained by the 1958 American sample. As a result, one would receive lower standard scores on the 1985 Canadian edition than on the U.S. norms [USES GATB].

222. The GATB CDN has only one section: Section I. The GATB CDN Section I includes 1985 norms for the General Working Population of Canadians as it was at that time.
223. The GATB CDN manual gives no information on the “re-norming”. Accordingly, the selection, characteristics and representativeness of the new Canadian sample is unknown. The Aptitude score conversion tables (p. 92-113) are given only for the GWP norms, that is, for the unknown sample of examinees. **There are no age specific norms, no gender specific norms, no occupation specific norms, etc.** The GATB CDN Manual (Section I) has only 113 numbered pages, with pages 92 to 113 providing the GWP norms.
224. In contrast, the USES GATB Manual Section III includes the Table 9-3 GATB Data and Aptitudes for Specific Occupations reporting mean aptitudes of **haphazardly collected samples of workers** in specific occupations in United States in 1950s or 1960s (i.e., non-normative ancient samples) using USES GATB Standard Scores (i.e., calculated relative to the 1952 GWP norms published in the USES GATB Manual Section I. The USES GATB Manual (Section III) has 396 numbered pages.
225. Both the USES GATB and GATB CDN are standardized with **mean of 100 and standard deviation of 20**. Note that this 100 ± 20 scale is different from IQ scale used with tests such as Wechsler Adult Intelligence Scales that are standardized with mean of 100 and standard deviation of 15.
226. The figure below shows the front page of the Manual for the USES GATB (Section III) side by side with the front page of the Manual for the GATB CDN (Section I). The USES GATB Section III Manual was published in 1970 whereas GATB CDN Manual was published 16 years later in 1986. The USES GATB Manual clearly identifies “UNITED STATES DEPARTMENT OF LABOR” as its publisher. In contrast, the GATB CDN Manual is clearly identified as “CANADIAN EDITION” and identifies Nelson Canada as publisher.



227. The USES GATB Manual Section III is freely available for download from a variety of sources including:

- (a) eric.ed.gov: <https://eric.ed.gov/?id=ED164579>
- (b) archive.org: https://archive.org/details/ERIC_ED164579

228. The GATB CDN Manual was available from Nelson Canada but **Nelson Canada stopped distributing the GATB CDN years ago at the request of the Government of Canada due to the GATB CDN age and obsolescence.**

The Trio misused the USES GATB Table 9-3 listing “teacher” data

229. In 2021, the Trio members attempted to bolster their claim of Ms. [REDACTED] “deficits”, “impairments”, being at the bottom of her peers in terms of intelligence, etc. by taking Table 9-3 from the USES GATB Section III Manual (US DOL, 1970) and falsely claiming that the table showed norms for the GATB CDN (Nelson, 1986) for “Elementary and Secondary School teachers.”

Dr. Suffield's falsehoods about and misuses of the USES GATB Table 9-3

230. The figure below shows a page from Dr. Suffield's September 27, 2021 Report, including the Table 9-3. Dr. Suffield described this table as “Table 9-3 of Section III (page 170) of the manual for the General Aptitude Test Battery (GATB)” (CFS957)

231. In his entire report, Dr. Suffield did not cite the manual from which he took the page 170 from. Dr. Suffield did not give authors, did not give a year of publication, did not give the publisher.
232. Accordingly, a reader of Dr. Suffield's report had no information at all which would indicate that Dr. Suffield was using a **wrong test manual** -- the USES GATB (US DOL, 1970), for a different test, normed some 30+ years prior to the GATB CDN (Nelson, 1986) and 55+ years prior to Ms. [REDACTED] testing with the GATB CDN.
233. The Table 9-3 is from the USES GATB Section III Manual (US DOL, 1970). The data published in it obviously cannot be the GATB CDN (Nelson, 1986) scores as the GATB CDN came to existence 16 years later.
234. Dr. Suffield then wrote the following:

Table 9-3 shows that the mean ("M") scores on G were 118 (with a standard deviation (SD) of 13 in the initial validation sample, 111 (SD 13) in the cross-validation sample, and 114 (SD13) for the combined sample of 497.

Ms. [REDACTED] score of 83 in Dr. Westcott's 2010 assessment was more than 2 standard deviations below this average, at approximately the 0.9 percentile of this sample of nearly 500 prospective teachers.

235. Dr. Suffield again did not disclose that he was directly comparing apples and oranges, that is, Ms. [REDACTED] scores on the GATB CDN (Nelson, 1986) in 2010 vs. the USES GATB (US DOL, 1970) scores of some students of education in their senior year tested in 1950s.
236. Dr. Suffield's direct comparison of scores obtained on two different tests, standardized on different populations in different historical eras, is grossly incompetent. Dr. Suffield's failure to mention that he was doing so is also dishonest.
237. In his response to the CAP, Dr. Suffield again copied Table 9-3 from the USES GATB (DOL, 1070) for the CAP, dug in, repeated, and strengthened his lies about the Table 9-3 (CFS 1048-1049):

She [REDACTED] further alleges that I then knew that no such comparisons were possible because, "no one actually administered GATB to any such actual workers in Ms. [REDACTED] occupation," and that Nelson Canada had told me so.

This is incorrect, and disingenuous. **As detailed in Sections III and IV of the Canadian edition of the GATB** [emphasis added], many occupations – including elementary and secondary school teachers – were studied extensively when the GATB was developed. Table 9-3 (below) shows data from the 234 elementary and secondary school teachers who participated in an initial validation, and another 263 teachers who participated in a cross-validation study. Thus, GATB scores for teachers are based on a total sample of 497 teachers.

238. As detailed above, anyone can persuade themselves that Dr. Suffield took the Table 9-3 from the USES GATB (DOL, 1970) rather than the GATB CDN (Nelson, 1986) manual, and that he was comparing apples to oranges.
239. Dr. Suffield dishonesty and incompetence is astonishing.

Dr. Westcott's falsehoods about and misuses of the USES GATB Table 9-3

240. On March 29, 2021, in her response to the CAW#1, **Dr. Westcott falsely submitted to the CAP** that the GATB was in fact “normed on a sample of 234 elementary and secondary school teachers” and **falsely claimed that Ms. [REDACTED]’s assertion that “the GATB was not normed on actual workers” was false** (CFW234).
241. Verbatim, Dr. Westcott stated:

“Upon review of the GATB manual, which I located in the Mandel and Associates test library and is the same manual used by Dr. Mandel in my training when I joined the firm [Mandel and Associates Ltd], I can confirm that the GATB was normed on a sample of 234 elementary and secondary school teachers - the average G was 118 with a standard deviation of 13. A cross validation sample of 263 elementary and secondary school teachers indicated the average G to be 111 with a standard deviation of 13. Ms. [REDACTED] score on the G scale of the GATB was 83, over 2 standard deviations below the normative sample average. [REDACTED] Ms. [REDACTED] assert in [REDACTED] complaint that the GATB was not normed on actual workers. The GATB manual indicates otherwise and in fact was in part normed on a sample of teachers as reported on page 170. A copy of the relevant excerpt of the GATB Manual is appended as Appendix F.

242. Again, Dr. Westcott did not mention she located **the wrong test manual** and that whatever she located was irrelevant.
243. The incompetence disclosed by Dr. Westcott is astonishing:
- (a) First, just like Dr. Suffield, Dr. Westcott located a wrong manual, a manual for a different test, the USES GATB (US DOL, 1970), published 16 years prior to the publication of the GATB CDN (Nelson, 1986).
 - (b) Second, Dr. Westcott admitted that the USES GATB manual she located in the “Mandel and Associates test library” was “the same manual used by Dr. Mandel in my [Dr. Westcott’s] training when I [Dr. Westcott] joined the firm [Mandel & Associates Ltd].”
244. As per her CV, Dr. Westcott “joined the firm” in January 2009, and thus, 20+ years after the GATB CDN (Nelson, 1986) was published, Dr. Mandel was still training his proteges using the USES GATB (1970) Manual even though Dr. Westcott actually tested Ms. [REDACTED] with the GATB CDN (Nelson, 1986).

Dr. Mandel's incompetence about and misuses of the USES GATB Table 9-3

245. On March 29, 2021, in his response to the CAM#1, Dr. Mandel wrote:

54. The manual for the General Aptitude Test Battery (1979) provides a table (9.3) titled “GATB Data on Aptitudes for Specific Occupations.” The table is 70 pages long and provides objective data on 446 occupations, including teacher (#404, page 170). Three sets of data for both elementary and high school teachers are provided: an initial validation sample (N=234); a cross-validation sample (N=263), and a combined sample (N=497). Table 9.3 in the GATB manual shows that the mean scores on G (general learning ability – equivalent to FSIQ) were 118 (SD = 13) in the initial validation sample; 111 (SD = 13) in the cross-validation sample, and 114 (SD = 13) for the combined sample. [REDACTED] raises objections to the statement included in our

description of the GATB introduction [in Westcott September 2010 Report] "The GATB does what few other tests do; it permits comparison of client characteristics with those of actual workers in specific occupations." Yet Table 9.3 in the GATB manual proves that the statement is correct. Extracts from the GATB manual, or the full manual, can be provided to the College upon request.

...

57. The field testing with the GATB, included in Table 9.3 of the GATB manual, provided aptitude scores for teachers based upon a sample of 497 university seniors in Education programs. This found that the average score on G for the combined sample was 114 (SD = 13). Ms. [REDACTED] scores on this measure was 83, more than 2 SDs below the mean.

..

72. [REDACTED] claim [REDACTED] that the GATB does not measure abilities of actual workers in specific occupations is incorrect. In fact the GATB manual (Table 9.3) lists empirical data for the aptitudes of 446 occupations, including teacher.

246. Again, Dr. Mandel did not mention he was talking about **the wrong test manual**, that no one actually did any field testing with teachers for the GATB CDN (Nelson, 1986), and that whatever he was talking about was irrelevant. In fact, Dr. Mandel was piling one falsehood over another falsehood.

247. Dr. Mandel's incompetence and falsehoods are astonishing:

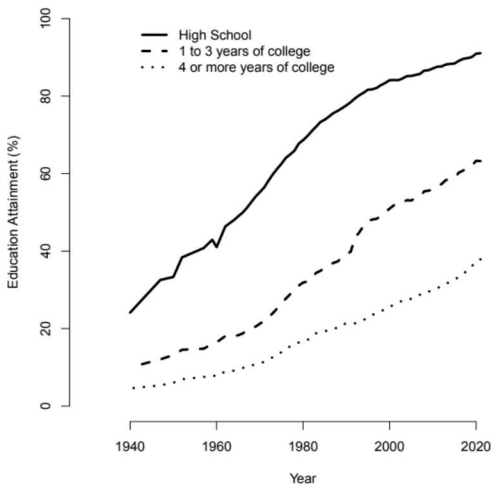
- (a) Ms. [REDACTED] was administered the GATB CDN (Nelson, 1986).
- (b) The GATB CDN (Nelson, 1986) manual has no normative data for any occupations.
- (c) Table 9-3 is from the USES GATB (US DOL, 1970) manual for a different test (available online, see above)
- (d) One cannot directly compare Ms. [REDACTED] score on the GATB CDN to scores on different tests such as the USES GATB. If Dr. Mandel wanted to predict how Ms. [REDACTED] would score on the USES GATB, Dr. Mandel would need some regression equation to calculate Ms. [REDACTED] USES GATB predicted score. This is explained in any elementary statistics or psychometrics textbook.
- (e) Dr. Mandel's statement that "the mean scores on G (General learning ability – equivalent to FSIQ)" is patently false (in part because of the Flynn Effect again):
 - i. First, the USES GATB is standardized with mean of 100 and SD of 20. In contrast, the FSIQ is standardized with mean of 100 and SD of 15. So for example, the USES GATB score of 111 is not equivalent to FSIQ of 111 but to 108 only.
 - ii. Second, Dr. Mandel points to no research demonstrating equivalency of the USES GATB and the GATB CDN scores. In fact, the GATB CDN Interpretive Manual states:

As had been expected [back in 1985], average raw scores obtained by the 1985 [Canadian] sample were significantly higher than those obtained by the 1958 American sample. As a result, one would receive lower standard scores on the 1985 Canadian edition than on the U.S. norms [USES GATB].

- (f) The "sample of 497 university seniors in Education programs" in Table 9-3 was not in any shape and form representative of elementary school teachers; it was the sample of the university education program seniors at the time when university degree was not required

for teaching. These seniors were education's elites and not representative of elementary school teachers.

- i. The figure below, based on US Census, shows that few percent of US population attained undergraduate degrees in 1950s.



- ii. The Table below from Harrigan (1992) shows that in Canada in 1950s only 20% of teachers held university degrees (and most of those were not elementary school teachers).

TABLE 6

B. University Degrees: All Teachers

	Percentage of Teachers Holding University Degrees*			Coefficient of Variation		
	Total	Female	Male	Total	Female	Male
1938	15%	11%	30%	53%	49%	41%
1940	16	10	30	58	65	46
1946	15	9	36	62	65	43
1952	20	11	42	14	7	24
1954	19	11	43	11	6	21
1960	21	12	42	12	7	24
1965	28	17	50	16	10	28
1970	42	28	67	18	14	28
1973	57	42	78	20	17	35
1980	77	67	90	12	18	7

* On average 6% of males, 1-2% of females held Masters degrees 1952-1970, rising sharply to 10% for men in 1973.

248. Dr. Mandel's comparison of Ms. [REDACTED] GATB CDN scores to the USES GATB scores of some educational students elite in US 70 years ago is astonishingly incompetent.

The Trio failed to locate a correct test manual – the GATB CDN Manual

249. The page 170 from the "GATB manual" is NOT from the GATB CDN Manual but from the ancient USES GATB Manual Section III. To determine this simple fact, Dr. Westcott or anyone else can click on either of the two following links, download the manual, look up the page 170, ascertain it is the same page the Trio used in their reports and submissions to the CAP, and then page back to the first two pages where one finds that this page 170 is from the USES GATB Manual published by the US Department of Labour in 1970, some 16 years before Nelson Canada published the GATB CDN administered to Ms. [REDACTED]

(a) eric.ed.gov: <https://eric.ed.gov/?id=ED164579>

(b) archive.org: https://archive.org/details/ERIC_ED164579

250. The numbers reported on page 170 of the USES GATB Section III Manual are not scores of any "actual workers", they are not scores of any actual teachers, and they are certainly not representative of any actual teachers in 1950s nor today. They are scores of university students enrolled in studies for Bachelor of Education degrees in 1950s when only a few percent of population attended universities and the vast majority of elementary school teachers did not have university degrees nor 16 years of education.
251. **Once the Trio locates the correct test manual, the Trio will find that those occupation specific norms do not exist for the GATB CDN and that Dr. Westcott's plagiarized statement was false.**

The Trio's contraventions of the HPA, COE, and SOP

252. The Trio's actions detailed above occurred in 2021 or later. According, the HPA, COE2017 and SOP2019 apply.
253. The Trio members, individually and jointly, contravened the HPA 1(pp)(i) by "displaying a lack of knowledge or or lack of skill or judgment in the provision of professional services" and the HPA 1(pp)(xii) by "conduct that harms the integrity of the regulated profession", by
- misrepresenting that "Schmidt and Hunter (2004) indicated that the average IQ for teachers is 122"
 - failing to disclose to the CAP that Schmidt and Hunter (2004) merely reproduced their Table 1 from Table 1 published by Harrell and Harell (1945) nearly 80 years ago
 - failing to disclose that the "teachers" in Harrell and Harrell (1945) Table 1 were not representative of any population in 1940s nor today
 - failing to recognize that one cannot use different standard scores (e.g., T-scores, IQ scores, GCT scores) interchangeably
 - failing to recognize that one cannot directly compare Ms. [REDACTED] WAIS-IV CDN (2008) IQ scores to the GCT scores
 - failing to recognize that GCT data would have to be transposed to IQ scale and corrected for Flynn Effect in order to speculate how Ms. [REDACTED] WAIS-IV CDN (2008) score would compare to that unrepresentative sample of teachers
 - misusing obsolete WAIS (1955)/Wonderlic (1992) "teacher" data
 - failing to disclose that the "teachers" in Wonderlic (1992) were not representative of any population
 - failing to recognize that WAIS (1955) data would have to be corrected for Flynn Effect in order to speculate how Ms. [REDACTED] WAIS-IV CDN (2008) score would compare to the unrepresentative sample of Wonderlic (1992) teachers
 - failing to recognize and to disclose that the GATB CDN (Nelson, 1986) is different test than the USES GATB (DOL, 1970)
 - failing to locate a correct test manual: GATB CDN (Nelson, 1986)
 - misusing the USES GATB (DOL, 1970) test manual as if it was the GATB CDN Manual
 - misusing "teacher" data from the USES GATB (DOL, 1970) manual to make disparaging claims about Ms. [REDACTED] intelligence
 - misrepresenting to the CAP that the page 170 with teacher data was from the GATB CDN manual
 - failing to be cognizant about massive changes in the society and the World over the last 80 years including changes in education attainment, technology, work force structure, etc.

- (p) failing to recognize that the USES GATB (DOL, 1970) data would have to be corrected for Flynn Effect in order to speculate how Ms. [REDACTED] GATB CDN (Nelson, 1986) scores would compare to the unrepresentative sample of the USES GATB (DOL, 1970) teachers
 - (q) ignoring contemporaneous Yesting (1996) data on the GATB CDN showing that Ms. [REDACTED] GATB CDN scores were comparable to Canadian university students
254. The Trio's members' actions detailed above also contravened the COE2017 standards:
- (a) Standard I.7 (misuse of psychological knowledge)
 - (b) Standard II.6 (competence)
 - (c) Standard II.9 (keep up to date with relevant knowledge...)
 - (d) Standard II.17 (benefit/risk)
 - (e) Standard III.1 (no participation in dishonesty, fraud, misrepresentations)
 - (f) Standard III.4 (maintaining competence)
 - (g) Standard III.8 (acknowledge limitations)
 - (h) Standard III.10 (communicate completely and objectively)
255. The Trio members' actions detailed above, individually and jointly, also contravened the SOP2019 Standards requiring the Trio members to practice only within their areas of competence, to have sufficient knowledge, to base their opinions only on "the professional knowledge of the discipline", etc.:
- (a) Standard 4.1 "A psychologist shall not provide a professional service or supervision of a professional service unless the psychologist is competent through education, training and/or experience to provide that professional service."
 - (b) Standard 4.2 "A psychologist shall maintain competence to ensure that any professional services provided conform to current standards of the profession."
 - (c) Standard 5.2 "A psychologist shall not provide a professional service when there are reasonable grounds to believe that the treatment may lead to harm and no demonstrable evidence of benefit exists, even if the client has consented to the treatment and/or intervention."
 - (d) Standard 5.9 "In stating a professional opinion, a psychologist shall note limitations regarding inferences made by the psychologist in forming the opinion."
 - (e) Standard 5.10 "A psychologist shall base an opinion on, and limit an opinion to, reasonable and generally accepted practice standards and the theoretical and scientific knowledge base of the discipline."
 - (f) Standard 13.3 "A psychologist shall not provide, nor permit others to provide, false or misleading information concerning professional services offered by the psychologist."