

## Developing a Test

**W**E ENDED OUR SESSION IN THE LAST ISSUE IN THE MIDDLE OF A discussion about how to maximize the benefits of your workout. We covered increasing your energy level by using testing to keep teaching your audience, improving your general well-being through good test questions, and perking up your message by setting pass rates and a test-out option. While these are all necessary considerations, you should also reflect on the program holistically. There are many elements that combine to make a good training routine: Are you accurately focusing on each of the different aspects of your training program, and are they set at the correct levels? You should also consider whether you are really achieving your maximum workout (e.g., is your training fully effective?) and if there is anything else you should be doing to increase its benefits (e.g., are there knowledge gaps that persist?).

We've already covered the mechanics of writing a good test question, so let's continue this testy discussion by walking through the art of putting together the full test. You started the training process by outlining the topics

you were going to cover in the training session. You may even have written your training materials, although this isn't necessary. So how do you create a good test that covers all the necessary points?

### Examine the Full Workout

A good workout routine includes many different elements: warming up, cooling down, weight training, and cardio, to name a few. When evaluating your full workout, you ensure that you are utilizing each aspect of the regimen in a way that will benefit you the most. Similarly, your test should cover all areas of your program in a way that is the most beneficial to your audience. To do this, you must first decide what topics you will cover. In keeping with our job-based training philosophy, focus on the key points for your audience members to do their jobs well. For instance, if you are training tellers on how to accept deposits, you might select the following:

- reporting triggers under BSA for both CTRs and monetary instrument logs
- how to aggregate cash to determine whether a CTR is required (e.g., cash



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in versus cash out, how to handle alternative deposits such as night drop and conductors who deposit funds into multiple accounts)

- determining if a customer is exempt from reporting
- what would be considered suspicious behavior for making cash deposits
- what deposits must be made available immediately
- what are the maximum Reg. CC holds for exception and case-by-case reasons for both local and nonlocal items
- how to complete a hold notice through the system or, if it is down, manually

### Leveling the Routines

As you consider each portion of your workout, consider how frequently you engage in each. The result should maximize your benefits. Similarly, once you have outlined what you want your audience to walk away knowing, count the items you've listed. You should have at least 10 to provide a true test of their knowledge. If you don't have that many items listed, double up on the most important points and write more than one test question per topic. More than 10 is fine, too. If that is the case, check your math to make sure the scoring will be fair. Assuming you stick with the industry standard of requiring an 80 percent to pass, if you have 14 items your trainees could miss only two to earn better than an 80 percent. (Missing three items pulls the score down to 78 percent.) If you bumped the number of questions to 15, trainees could miss three and still pass.

### Maximizing the Workout

After reviewing your workout and establishing baselines for each aspect, consider whether there is anything else you can do to maximize the benefits. At the Training Room, after we have determined the topics we will target, we start writing appropriate scenarios to fit each question. The questions should be robust but fair. In other words, they shouldn't be so easy that your audience can pass without some knowledge of the subject, but also shouldn't

be so difficult as to require a Ph.D. Just make sure that the test items include the key questions trainees should know and will typically use in their day-to-day responsibilities. Here are a few additional tips for writing good, fair test questions:

There should be ONE right answer. Avoid responses that are perceived as tricky such as "none of the above" or "all of the above." The same is true for questions that ask the audience to pick all of the correct answers from a list.

Try to build each question around a scenario. In other words, rather than asking "What is the cash amount that triggers a CTR?" ask "Which of the following customer deposits require a CTR?"


Review your training materials and the test in tandem to ensure that you actually covered the right answer and it wasn't lost in the editing process.

Make sure that the test-wise person can't answer the questions without reading the material. For instance, randomize which answer is correct, and don't start all wrong answers with the same pattern or have the correct answers be the only lengthy responses.

In our last session, we touched on the facts that good training uses repetition to drive home the point and that open book tests are fine. Both achieve the ultimate goal of furthering the knowledge of our audience. In taking that thought one step further, you might also consider directing your audience to the topic material being covered in each question. If you are using e-learning, you can provide a link that takes learners directly to the section that covers the question so that they can read it again. For classroom training, provide the name and location of the procedure manual. If you don't wish to provide these links during the session, consider providing them after the test. You don't want your audience to walk away with incorrect notions or the perception that compliance belongs in an ivory tower rather than on the ground with them.

Speaking of walking away, our time is just

about up for today. In the last year, we've covered the full range of the training process, starting with defining job-based training and stepping through deciding whom to train, what to cover, how to train our audience more effectively, and how to test their knowledge. We hope that this has allowed you to evaluate your training program in the context of your resources, risks, and particular needs, and to reap the benefits of your time spent with us. As we move forward with our Training Room sessions, we'll look at more targeted topics. Because the Bank Secrecy Act (BSA) is one of the hottest topics in compliance right now, we'll spend our next workout covering ways to enhance your program through training.

**Editor's Note:** *If you have topics you wish to see covered in the Training Room, please e-mail suggestions directly to the author.* 

### ABOUT THE AUTHOR

**Meg Sczyrba, CRCM & CRP**, is the director of global credit and regulatory support at PayPal. Prior to joining PayPal, she served as the compliance processes manager at Washington Mutual in Seattle, Wash. She has more than 15 years of experience in the banking industry and has spent a substantial amount of time building training solutions at several banks. Ms. Sczyrba is a member of the ABA Bank Compliance magazine's editorial advisory board, ABA School Board, and the California Bankers' Regulatory Compliance Committee. She is a former member of the Institute of Certified Bankers' CRCM Advisory Board and the ABA's Compliance Executive Committee. She also speaks on various topics at industry conferences. Ms. Sczyrba attended the University of Missouri-Columbia where she earned a bachelor's degree and a J.D. In a previous life, she was an attorney. Reach her via e-mail at [mscopyrba@paypal.com](mailto:mscopyrba@paypal.com); she's happy to share any training information in her library or to answer any questions you may have regarding training.