



American Association of
NURSE ANESTHESIOLOGY

Guidelines for Completion of a Prior Approval Application

Provider-Directed Independent Study

These guidelines are intended to assist providers who are applying to AANA for prior approval of a **provider-directed independent study (PDIS) program they want to present at a future date.** All AANA prior approved PDIS programs provide Class A CE credit/MAC Ed credit.

Independent study is a self-paced asynchronous learning activity developed for individual use in which the participant receives program materials electronically or through the mail and completes the required activity outside a formal organized learning environment.

Prior approval cannot be awarded to those programs that have already been published and provided to the subscribers or placed on a website.

Application Submission

The prior approval application process is web-based via the CE Portal at www.aana.com/ceportal. The program provider must have a User ID and Password that is specific to the program provider. Contact the AANA CE Department to request login in credentials at continuingeducation@aana.com. Once logged in, progress through the online form at your own pace, completing the tabs in order. Required application materials can be attached to this application during the next steps. This application will not be submitted to AANA for review until the end of the application has been reached and any additional materials and associated application fee have been submitted. Until that time, the entered information will be stored on the site providing navigation instructions within the CE Portal are followed, and you will be able to move forward and backward throughout the application process until submission. This application is best used with Google Chrome or Internet Explorer. Mobile devices are not recommended.

Credit card payment is requested at the end of the application process. The fee applies to each application submitted.

Program Coordinator

The program coordinator is the individual who will be the liaison between the provider and the AANA. This individual receives the AANA approval notice and all correspondence related to the program. It is important to include the requested contact information for the coordinator in the application, so the coordinator can be easily reached by the CE Department during the hours of 8:00 am to 4:00 pm, Central Time.

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The name, address, fax, email and phone numbers for the program coordinator will also be used for any paid advertisement in the AANA Calendar of Events unless the CE Department is otherwise notified.

The CE Department must be notified of any changes affecting its communication with the provider or program coordinator such as a change in the mailing address, telephone number, email address, administrative structure, the individual responsible for coordinating the CE program and recordkeeping, or any other information pertinent to the program.

Materials to Submit with the Application

- A. **Application fee.** The application fee is determined based on the number of Class A CE credits/MAC Ed credits requested and is automatically calculated in the CE portal. The fee structure is \$360 for up to 12 Class A CE credits/MAC Ed credits requested and \$18 per Class A CE credit/MAC Ed credit over 12 that is requested. The payment is the last step in the application process before the application is submitted for review and is payable via credit card. If paying by check, select the pay by check option and an invoice will be immediately available to you in the CE portal. The invoice must accompany the check when submitting the payment to AANA. The fee is nonrefundable and nontransferable if the application does not meet the CE requirements or the provider withdraws the application.
- B. **Advertising Requests.** Program providers may request advertising in the **Event Calendar** tab when completing an application. Advertisements placed in the Calendar of Events appear in nurseanesthesiology.aana.com every other month (September, November, January, March, May, and July) alternating months with the *AANA Journal* (October, December, February, April, June and August). The fee to advertise prior-approved CE Programs in the Calendar of Events is \$180 per listing, which includes hyperlinking of the web address in the advertisement, and a link directly to the [Calendar of Events](#) that is posted on www.aana.com as well as in the bi-monthly *Anesthesia E-ssentials* that is emailed to the AANA Membership.

State Nurse Anesthesia Associations who plan and sponsor their meetings do not have to pay for a notice of their upcoming programs to be placed in the Calendar of Events, although the months to advertise must be selected during the prior approval application process in the CE Portal. However, if the state association outsourced the meeting planning to a commercial provider, the advertising fee is required from that provider.

Calendar of Events fees are nonrefundable and nontransferable.

- C. **Program Outline I tab.** Progress through the Program Outline I tab providing the detailed information requested in each field. Attach the Certificate of Completion and the Learner Assessment and Program Evaluation form where requested.

Requirements for the certificate of completion to be issued to all participants, including nurse anesthetists - both AANA members and nonmembers - who complete the program. The AANA logo cannot be used on any certificates for programs that are not sponsored by the AANA. Certificates must contain the following information:

1. Name of participant;
2. AANA ID number;
3. Name, city, and state of program provider;
4. Title of CE program;

5. Date of CE program;
6. City and state for location of CE program, if applicable;
7. Number of Class A CE credits/MAC Ed credits awarded to the individual;
8. AANA code number and expiration date;
9. Number of Class A CE credits/MAC Ed credits approved by AANA;
10. Provider signature verifying completion.
11. California Board of Registered Nursing (CABRN) provider statement. If the program provider does not have a CABRN number, the following AANA CABRN statement may be used.

AANA is an approved provider by the California Board of Registered Nursing, CEP #10862.

Note that items 8 and 9 need to appear in the AANA prior approval statement as shown in the following format:

This program has been prior approved by the American Association of Nurse Anesthesiology for XX Class A CE credits/MAC Ed credits; Code Number XXXXXXXX; Expiration Date XX/XX/XX.

Requirements for the Learner Assessment and Program Evaluation instrument that will be issued which enables all participants to assess the following: (1) learner's achievement of each objective; (2) teaching effectiveness of each faculty member or presenter; (3) relevance of content to objectives; (4) effectiveness of teaching methods; (5) achievement of personal learning objectives; (6) state one item learned that will improve participants nurse anesthesia practice; and (7) state any barriers to implement what is learned.

The Learner Assessment and Program Evaluation instrument must also include a field for the participant's name and AANA ID#, as completion of the evaluation tool is required to receive Class A CE credit/MAC Ed credit.

The required form of measurement on the Learner Assessment and Program Evaluation instrument is a defined 5-point Likert scale or higher form of measurement.

- D. **Program Outline II tab.** A complete entry for each lesson or content area within in the program must be created following the guidelines below.
1. The title of each presentation and the name, title and credential of each presenter/author. For associate (resident) member presenters, list the associate member's proper professional and earned academic credentials (e.g. RN, BSN), as well the name of a specific faculty sponsor or mentor, along with the professional credentials of each sponsor or mentor (i.e. CRNA, DNP, PhD or MD) for each associate member identified as delivering CE-earning content.
 2. A description or outline of the content to be presented for each lecture.
 - a. Refer to the Content Section from the *AANA Continuing Education Program* located on www.aana.com for information regarding content.

3. An hour-by-hour breakdown of the program that specifies the start and end time for each lesson. One CE credit is awarded per 60 minutes of educational content. For each 60 -minute increment, it is allowable to have up to, **but no more than** 10 minutes of evaluation and/or testing directly related to the 50 minutes of educational/learning content. Partial credits are awarded in 0.25 increments. Partial hours not listed in 0.25 increments are rounded down to the next 0.25 CE credit. The number of credits reflected in the program schedule **must** match the number of credits requested on the Basic Info tab.
4. All educational content must have a minimum of 1 associated learner objective for each 60 minutes of content. For content less than 60 minutes, 1 learner objective is required per topic. For partial credit greater than 1 credit, an additional learner objective is required. For example, if applying for 10.5 CE credits, 11 objectives are required. The terms "learner objectives" and "learner outcomes" are used interchangeably. The objectives are to be written as statements that identify the participant's expected mastery after attendance at the program.
 - *Example of a correctly written learner objective:* At the conclusion of this presentation, the participant should be able to calculate the appropriate drug dosage for the new anesthetic agent based on the patient's weight.
 - Presenter's goals are not acceptable learner objectives. For example, "To inform the nurse anesthetist about the latest trends in outpatient surgery" is the goal of the presenter; not a measurable learner objective.
- E. The National Board of Certification and Recertification for Nurse Anesthetists (NBCRNA), requires 60 hours of Class A credits/MAC Ed credits over a 4-year CPC/MAC cycle. Class A credits/MAC Ed credits are earned from assessed continuing education. The assessment methods for prior approved PDIS programs are post-test and self-assessment via the Learner Assessment and Program Evaluation instrument. Post-test requirements are located on page 8.
- F. **CE content areas on certificate of completion.** Several state boards of nursing require documented credit in specific content areas for a nurse anesthetist to renew their APRN license. Although this is not mandatory, we do suggest that the number of CE credits earned during your program in content areas such as pharmacology, HIV/AIDS or legal issues be designated on the certificate of completion issued to the nurse anesthetist. This will provide the CRNAs with the documentation they are required to submit without the need to contact you after the program for this information. Note: While the AANA approves CE credit, the AANA does not designate content areas for program providers other than AANA.
- G. **Pharmacology & Therapeutics Content.** The CE Provider submitting programs containing pharmacology and therapeutics content may request pharmacology designated credit when applying for AANA prior approval. Along with the core content requirements as mentioned in the Content section, pharmacology content will provide a means to integrate advanced knowledge of pharmacology, pharmacokinetics, and pharmacodynamics content across the lifespan and prepare the certified registered nurse anesthetist to initiate appropriate pharmacotherapeutics safely and effectively.

Examples of pharmacology content eligible for credit include the following:

- drug specific information
- safe prescribing practices
- safe medication administration

- prescribing methodologies
- new regulations

Learner objectives provided for pharmacology content must explicitly identify how the content will meet the learning objectives. An example of a pharmacology learner objective is, “Develop pharmacologic measures for administration to reverse neuromuscular blockade to industry standards and best practices.” Presenters of pharmacology content must have content expertise in pharmacology. When a program is prior approved with a pharmacology credit designation, the Certificate of Completion must include the following designation statement:

The American Association of Nurse Anesthesiology designates this program as meeting the criteria for up to XX CE credits in Pharmacology & Therapeutics.

H. Pain Management Content. The CE Provider submitting programs containing Pain Management content (inclusive of but not limited to acute surgical pain management, non-surgical pain management, chronic pain management) may request Pain Management designated credit when applying for AANA prior approval. Along with the core content requirements as mentioned in the Content section, Pain Management content will provide a means to integrate advanced knowledge of assessment, diagnosis, treatment and procedural safety involved in Pain Management therapies/procedures to prepare the certified registered nurse anesthetologist to initiate appropriate Pain Management therapies safely and effectively throughout the lifespan. This content area should be developed to maintain and improve the knowledge, competency, and performance in the science and practice of the CRNA who provides care to patients with acute/surgical pain and/or chronic/nonsurgical pain.

Examples of pain management content eligible for credit include the following:

- Clinical Practice Guidelines related to pain management
- Current research findings related to pain management, pharmacology, anatomy and physiology
- Latest technologies and techniques related to pain management
- Concepts related to regional anesthesia and/or pain management therapies in the clinical setting
- Legal, ethical, and professional issues related to surgical and/or non-surgical pain management
- Psychosocial, spiritual, and cultural aspects of pain management
- Non-allopathic considerations for pain management
- Assessment and evaluation of the patient with acute surgical pain and/or chronic pain
- Foundations of initiating an acute pain service
- Business fundamentals in acute and/or chronic pain management

Acceptable activities/support materials include the following:

- Presentations (in person or virtual)
- Research abstracts/posters
- Journal access
- Consensus guidelines
- Video tutorials
- Simulation/Cadaver Labs

Learner objectives provided for pain management content must explicitly identify how the content will meet the learning objectives. Course/Activity objectives should use a general format, clearly stating the intended, measurable outcomes. The following are examples of a pain management learner objectives:

Describe and develop clinical practice measures for use of regional anesthesia in orthopedic surgery to industry standards and best practices.

In the simulated setting, demonstrate competence in the performance of advanced techniques of regional anesthesia.

Describe the psychosocial and cultural aspects of pain management among different groups of patients within the geographical area of Southwestern United States.

Create the basic elements of a business plan for establishing an acute and/or chronic pain service.

Presenters of pain management content must have content expertise in the specified aspect of pain management topic designated for the continuing education. Examples of content expertise include, but are not limited to, recent experience lecturing on the topic area, completion of a fellowship in acute/chronic pain management, active sub-specialty certification in Non-Surgical Pain Management (NSPM) from the NBCRNA, etc.

When a program is prior approved with a Pain Management credit designation, the Certificate of Completion must include the following designation statement:

The American Association of Nurse Anesthesiology designates this program as meeting the criteria for up to XX CE credits in Pain Management.

Disclaimer: There are education programs that were prior approved for continuing education credit (CE) that do not have explicit Pain Management credit designated by AANA, as the programs were either approved before AANA began designating Pain Management credit or the program provider opted to not apply for Pain Management credit. If the CRNA is required to submit Pain Management CE for authority to perform pain management therapies/procedures and the program does not appear in the Pain Management CE field on their AANA CE transcript, the CRNA should verify with their Board of Nursing or regulatory body, it will accept Pain Management content approved for CE from the program description to meet the requirements for renewal of authority to perform Pain Management therapies/procedures.

Random Audits

The AANA CE Department will conduct random and targeted audits to determine compliance with AANA prior approval requirements and provider responsibilities. A program provider audited by the AANA must provide any or all of the documentation stated in Standard XI: Recordkeeping of the AANA CE Program as requested within 30 days of the request. Failure to meet the deadline may result in revocation of approval and no refunds will be made. The AANA reserves the right to deny, revoke or suspend approval based on non-compliance or non-responsiveness of the provider.

Application Processing

Applications for prior approval are reviewed thoroughly before approval is awarded. Providers will be notified within 30 business days if the application is not complete and given an opportunity to revise and resubmit the application in the CE Portal. The information must be received before publication and distribution of the independent study. Prior approval will not be awarded until the application is complete. Providers can check the status of the application in the CE Portal.

Prior Approval Notification

The notification that a CE program has been awarded prior approval contains the assigned AANA code number, the number of Class A CE credits/MAC Ed credits awarded, the date of AANA approval, the expiration date, the provider's recordkeeping and participation recording responsibilities, and all other information pertinent to the approval.

The code number is assigned a specific date range with a maximum number of credits and can be used only for the date(s) and CE credits shown on the approval notice. The nurse anesthetist is eligible to receive the maximum number of credits only one time under the program's code number.

The AANA prior approval statement must appear on all correspondence, promotional materials, and certificates of completion.

The beginning and ending dates for which, the code number and volume are assigned can be changed only if the CE Department is notified and approval is granted before the publication of a particular volume. Prior approval will not exceed three years. For programs with volumes, participants will receive monthly program materials the first year and have up to the expiration date to submit their lessons to the program provider. The program provider is responsible for submitting content updates relative to science and technology.

Prior Approval Announcement

The AANA CE Program **does not award** CE units (CEUs), continuing medical education credits (CMEs), or continuing education points (CEPs). These designations are **not** interchangeable with the terms CE credit or contact hour and are not permitted for use on the certificates of completion.

The announcement of AANA prior approval that appears on the certificate of completion and all other materials must contain the following information:

This program has been prior approved by the American Association of Nurse Anesthesiology for XX Class A CE credits/MAC Ed credits; Code Number XXXXXXX; Expiration Date XX/XX/XX.

The use of any statement such as "AANA approval pending" or "approval applied for," is not permitted on any materials or promotional literature; it is misleading and can be considered false advertising.

When a program is prior approved with a pharmacology credit designation, the Certificate of Completion must include the following designation statement:

The American Association of Nurse Anesthesiology designates this program as meeting the criteria for up to XX CE credits in Pharmacology & Therapeutics.

Provider Recordkeeping Responsibilities

The program provider is responsible for recording CE credits via upload of an Excel or CSV file or manual entry and issuing certificates of completion to all attendees after the Learner Assessment and Program Evaluation forms have been completed and submitted. The guidelines for recording participation and issuing certificates of completion are included in the automatic prior approval notice that is emailed to the provider and are available on www.aana.com.

Notice of Denial of Approval

The CE Department will notify the applicant in writing if the CE program or any part of the program is denied. The notice will briefly state the reasons for the denial and will advise the applicant of the right to seek reconsideration by the CE Committee.

Reconsideration

An applicant may request reconsideration of a CE Committee decision by submitting a written request within 30 days after the date on the denial notice sent to the applicant. The applicant must provide the CE Committee with the reasons that he or she believes that the denial of approval was inappropriate, and a description of modifications made to the program to correct any cited deficiencies. The applicant may appear before the CE Committee or may submit written materials to the CE Committee to address the identified problem areas.

The CE Committee will notify the applicant of its decision regarding reconsideration of the denial of the applicant's CE program. If the CE Committee affirms the denial of the applicant's CE program, the notice will briefly state the reasons for affirming the denial and will advise the applicant of the right to appeal the decision to the Continuing Education Appeals Panel (the "CEAP"). The applicant may appeal an Adverse Determination only after (a) the applicant has filed a timely request for reconsideration, and (b) the CE Committee has affirmed its initial decision to deny approval. The CEAP does not award CE credit.

Failure to Comply with Provider Responsibilities

If a CE provider fails to comply with the AANA's *Continuing Education Program* standards, or fails to meet any of the recordkeeping responsibilities, the CE Committee may withdraw its approval of the CE activity. The provider will receive 30 days written notice of the specific charges and the reasons for withdrawal and will have a reasonable opportunity to respond and be heard by the committee. If the CE Committee withdraws its approval, the provider may formally appeal the action to the AANA's Continuing Education Appeals Panel within a 30-day period.

Traditional Provider-Directed Independent Study (PDIS) Rationale

Provider-Directed Independent Study (PDIS) is a self-paced learning activity developed for individual use in which the participant receives program materials through the mail, computer, or website, and completes the required activity outside a formal, organized learning environment. Provider-directed independent study is also known as home study. The PDIS cannot be approved for use in conjunction with or as an adjunct to another program that has received prior approval. The format requires that the program be able to meet the full criteria for PDIS approval. Each activity submitted for CE approval is evaluated individually to determine the number of Class A CE credits/MAC Ed credits it will receive.

The CE Program definition assumes that the individual receives the information electronically or via mail. There may be certain circumstances under which a provider will be given approval by the CE Committee to distribute an independent study on site.

The medium by which a CE program is presented does not alter the specific requirements established by the AANA CE Committee. The fact that an independent study is offered on a website does not diminish the necessity for submission of complete and substantive materials as part of an application for approval.

Providers who submit programs that have the same content, but which will be offered in more than one medium (e.g., on-line, teleconference education and self-directed study options) must send all materials for the program at the same time regardless of the types of medium. The program will receive one inclusive approval number for the approval period. Enduring content may have an expiration date of no longer than three years. It will be the program provider's responsibility to keep their content current with science and technology.

The provider should refer to the content section of the *AANA Continuing Education Program*, located on www.aana.com, to ensure that the proposed content is within the approval criteria. If there is any question about topics to be presented, the provider should contact the AANA CE Department for confirmation of acceptable content; otherwise, there is a chance that an article in print or other learning material content may not be accepted for CE credit.

A completed application that meets the following criteria is required for consideration of prior approval for an independent study.

1. The overall design that is submitted for approval must include:
 - a. One (1) complete packet of the instructional materials sent to a subscriber.
 - b. Content for the proposed independent study.
 - Outlines and power point presentations are not acceptable as sole content for an independent study. Outlines and short abstracts are not sufficient, except as supplemental materials.
 - Electronic copy of what the subscriber will see in its entirety if the learning activity is transmitted by computer or is presented on a website.
 - The content must contain sufficient substantive information to provide the learner with all the essential information without reference to original articles. Each article must contain a bibliography.
 - c. A statement that describes the program and the materials required for completion, how to interact with the resources provided and complete the program, and how the program reaches the subscriber.
 - d. A statement that describes the testing mechanism and feedback for the learner. The description must demonstrate that the learner automatically receives feedback concerning correct answers; the material should not have to be requested by the participant.

The answers to the test questions cannot appear in the materials that the subscriber will see before completing the posttest. The feedback and answers can be provided to the CRNA when they receive their certificate of completion. This must be part of the learning package.
 - e. A statement that the passing score is at least 80%.
 - f. A statement that there is no retesting for participants who score less than 80% on programs unless the programs are computer interactive or administered on a website (per guidelines identified in 2e).
 - g. A statement that describes the recordkeeping mechanism.
 - h. A copy of the learner assessment and program evaluation form the subscriber will complete at the end of the study program.
 - i. A copy of the certificate of completion the subscriber will receive upon completion of the program and the learner assessment and program evaluation form.
2. The instructional materials that the subscriber receives for each lesson must include:

- a. Learning materials such as, CDs, DVDs, articles, study guides, written lessons, objectives and test questions, and any other information related to the experience.
 - b. A statement that describes the materials required to complete the independent study which includes the following information; a description of the program, the materials required to complete the study, how to interact with the resources provided, how to complete the program, how the program reaches the subscriber, description of the testing mechanism and feedback for the learner, notice that the passing score is at least 80% and that there is no retesting for participants who score less than 80% (**unless the programs are computer interactive or administered on a website**), and a description of the recordkeeping mechanism.
 - c. Learner objectives and test questions for amount of CE credit requested as identified below:
 - one (1) learner objective and five (5) test questions for each whole CE credit requested.
 - one (1) learner objective and four (4) test questions for three-fourths (.75) of a CE credit requested.
 - one (1) learner objective and three (3) test questions for a half (.50) of a CE credit requested.
 - one (1) learner objective and two (2) test questions for a quarter (.25) of a CE credit requested.
 - d. The objectives must appear as part of the lesson regardless of the medium in which the study is conducted. Each lesson must start out with the objectives and conclude with the test questions.
 - e. For PDIS programs that are computer interactive or administered on a website, the program provider may allow for no more than three testing attempts per PDIS course, with no more than 50% of identical questions delivered across attempts. A passing score of 80% or higher on the post-test is required for the learner to receive Class A CE credit/MAC Ed credit.
3. If the learning activity is computer interactive or administered on a website, electronic files containing what the subscriber will see in its entirety must be attached to the prior approval application in the CE Portal.
 4. Independent studies may use abridgments or condensations of previously published material that are relevant to achieving the learner objectives.

Such abridgments must contain sufficient information to provide the learner with all the essential information, without reference to the original article. Short abstracts of randomly published material are not acceptable, except as supplemental materials.
 5. Although CE credit is awarded based on the number of objectives and test questions, each full CE credit requires on average, 60 minutes to complete which includes the post-test and the learner assessment and program evaluation form. Partial CE credit in .25 increments requires at least 15 minutes to complete.
 6. To receive Class A CE credit/MAC Ed credit, a participant must complete the independent study, the test must be received by the program provider, and the learner assessment and program evaluation form must be completed and submitted no later than the expiration date of the program specified by the provider.
 7. A certificate of completion must be forwarded to the participant upon successful completion of the program and receipt of the participant's completed learner assessment and program evaluation form. The certificate must contain the following electronically entered information: (a) the name of the participant; (b) the AANA ID number; (c) the name of the CE activity; (d) the name and address of the

provider; (e) city and state for location of activity, if applicable; (f) the date of the CE activity; (g) the number of Class A CE credits/MAC Ed credits awarded; (h) the AANA code number, volume number, and expiration date; (i) the signature of the provider who verifies participation in the program; and (j) California Board of Registered Nursing (CABRN) provider statement. If the program provider does not have a CABRN number, the following AANA CABRN statement may be used.

“AANA is an approved provider by the California Board of Registered Nursing, CEP #10862.”

- a. The certificate of completion must indicate the actual date(s) of completion of the CE activity and the number of Class A CE credits/MAC Ed credits earned.
 - b. The provider must be prepared to issue an interim certificate of completion for all nurse anesthetists who require the credits for recertification.
 - c. The date on the certificate must match the date on the CE credit import. For example, if a certificate of completion is issued in June, then the corresponding credit must appear on the June CE credit import.
8. The program provider is responsible for recording CE credits via upload of an Excel file or manual entry in the CE Portal and issuing certificates of completion to all participants. Nurse anesthetists participate in AANA prior-approved programs with the expectation that their Class A CE credits will be recorded in a timely, accurate manner so that their CPC/MAC is not delayed.

The guidelines for recording participation and issuing certificates of completion are included in the automatic prior approval notice that is emailed to the provider and is available on www.aana.com. A contact person must be available to verify participation and to answer questions from the AANA and subscribers.

Provider-Directed Independent Study (PDIS) for Response Generated Content

The AANA encourages innovation in CE programming with the understanding that there is compliance with the minimum standards of clearly articulated learning objectives, assessment and program evaluation. Approvals for nontraditional provider directed independent studies with design focused on response generated content may be made with the approval of the Continuing Education Committee on an application by application basis.

In addition to the standard information required for a prior approved provider directed independent study program as included in this document, the following must be submitted with the application for review:

- Application fee.
- Content Outline, which may be presented in categories.
- 2-3 general learner objectives per content category.
- Access to resources for each question/situation answered.
- Access to the entire platform from a user's experience, for which a user name and password must be provided at the time of application for the CE Department's use.
- Description of how Class A CE credit/MAC Ed credit will be awarded.
- Self-assessment via the Learner Assessment and Program Evaluation tool.
- Certificate of Completion.

Provider-Directed Independent Study (PDIS) for Simulation

Simulation exercises provide the certified registered nurse anesthetist with the opportunity to experience critical clinical situations, such as malignant hyperthermia or the difficult airway, in an environment that does not threaten patient safety. Each program submitted for CE approval is evaluated individually to determine the number of credits it will receive.