



STATE OF CONNECTICUT
OFFICE OF HEALTH CARE ACCESS

M. JODI RELL
GOVERNOR

CRISTINE A. VOGEL
COMMISSIONER

November 23, 2004

Abner S. Gershon, M.D.
Invision Medical Imaging, LLC
P.O. Box 370039
West Hartford, CT 06137-0039

Re: Certificate of Need Determination, Report Number 04-30399-DTR
Invision Medical Imaging, LLC d/b/a Invision Medical, LLC
Proposal to Obtain Fluoroscopy Machine and Install Lead-Lined Room

Dear Dr. Gershon:

On November 15, 2004, the Office of Health Care Access ("OHCA") received a Certificate of Need ("CON") Determination request regarding the proposal of Invision Medical Imaging, LLC d/b/a Invision Medical, LLC to obtain a fluoroscopy machine and install a lead-lined room in a private physician's office, at a total capital expenditure of \$152,943. OHCA has reviewed the information contained in your request and makes the following findings:

1. Invision Medical Imaging, LLC d/b/a Invision Medical, LLC is a limited liability company with a single member, Abner S. Gershon, M.D.
2. Dr. Gershon is an interventional neuroradiologist. In addition to his solo medical practice, he is a member of the University Medical Group at the University of Connecticut Health Center. He treats patients suffering from disease of the brain or spine, performs clinical consultations for referring physicians, and performs evaluations and management office visits for self-referred patients.
3. Minimally invasive spinal injections are performed as incidental procedures for therapeutic and diagnostic purposes. These procedures include epidural steroid injections, transforaminal injections, and discography.
4. The patients that may require a minimally invasive spinal injection will be examined and treated in the doctor's examination room where the lead-lining and the fluoroscopy machine have been installed. The fluoroscopy machine is used to visualize the placement of the needle into the patient's body. The exam room is not a designated procedure room.

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5. The incidental procedures usually require no sedation. On occasion, mild or moderate conscious sedation may be required for the procedure.
6. Patients from the state of Connecticut that have brain aneurysms, vascular malformations, disk herniations, neuritis, back pain and other conditions make up the current population served by the practice. The existing patients and appropriate new patients make up the targeted population.
7. No facility fee will be charged.
8. The proposal has a total associated capital expenditure of \$152,943:

Item	Expenditure
Construction/Renovations	\$70,000
Imaging Equipment (Purchase)	69,000
Medical Equipment (Purchase)	13,043
Total	\$152,943

9. Section 1(a) of Public Act No. 04-249, “An Act Concerning Regulation of Outpatient Surgical Facilities”, states that an outpatient surgical facility shall not include a medical office owned and operated exclusively by a person or persons licensed pursuant to Section 20-13, provided such medical office (1) has no operating room or designated surgical area;(2) bills no facility fees to third party payers;(3) administers no deep sedation or general anesthesia;(4) performs only minor surgical procedures incidental to the work performed in said medical offices...;(5) uses only light or moderate sedation or analgesia in connection with such incidental minor surgical procedures.

Based on the above findings, OHCA has determined that Certificate of Need approval is not required for Invision Medical Imaging, LLC d/b/a Invision Medical, LLC to obtain and install a fluoroscopy machine and lead-lined room at 21 Arch Road, Avon, CT.

Thank you for informing OHCA of your plans. If you have any questions concerning this letter, please contact Laurie Greci, Associate Research Analyst, at OHCA at (860) 418-7001.

Sincerely,

Signed by Cristine A. Vogel
Commissioner

c: Rose McLellan, Licensing Examination Assistant, DHSR, DPH

CAV: lkg