

Licensing Guide: Satellite Emergency Departments (H.B. 152)

Purpose

The Office of Licensing is creating a resource manual of frequently asked questions (FAQs) regarding satellite emergency departments. We review compliance with Utah administrative rules and statutes, and also ensure adherence to federal Centers for Medicare and Medicaid Services (CMS) standards in certified health settings.

Table of contents

1. Scope and Applicability
2. [CMS and Federal Certification](#)
3. [CMS and Federal Certification](#)
4. [Application Process](#)

Scope and applicability:

Q: Which locations does H.B. 152 affect?

A: This legislation applies to Satellite Emergency Departments located in Class I and Class II counties that are located more than 250 yards away from the parent hospital.

- **Class I County:** Population > 1,150,000 (e.g., **Salt Lake**)
- **Class II County:** Population 260,000 – 1,150,000 (e.g., **Cache, Davis, Utah, Washington, and Weber**)

Q: How does this change the licensing structure for these facilities?

A: To align with H.B. 152, hospitals with a satellite emergency department in the counties listed above must apply for a new “branch location” for each satellite location. They will continue to be covered under the main hospital's general license.

Q: Will there be a new administrative rule specific to Satellite Emergency Departments?

A: No. Satellite Emergency Departments are licensed as a branch location of the main hospital's general license. The rules will be located in the R432-100 General Hospital Standard rule. Some items may be specified in rule, while others will refer to state statute [H.B. 152 Health Care Facilities Amendments](#).

Q: How many Satellite Emergency Departments can be operated by an organization?

A: A health care organization may not operate a higher number of satellite emergency departments than 2 times the number of hospital emergency departments the health care organization operates in the state.

Q: Who will be conducting the inspections / surveys at satellite emergency departments?

A: Utah Office of Licensing (OL) staff who conduct inspections (surveyors) have a wide range of different backgrounds in the medical field and receive required training from the state of Utah and Centers for Medicare and Medicaid Services. The majority of our licensors who inspect/survey hospitals and emergency departments are registered nurses who have worked in a hospital setting. OL staff receive regular and annual training and have managerial oversight related to any inspection procedure.

CMS and federal certification:

Q: Does individual state licensing separate the satellite location from the main hospital for Medicare/Medicaid purposes?

A: No. According to the Centers for Medicare and Medicaid Services (CMS), the satellite emergency department will continue to be recognized as a satellite location of the main hospital.

Fees and renewals:

Q: How often must the Satellite Emergency Department license be renewed?

A: Fees for Satellite Emergency Departments in Class I or II counties will be collected at the same time as the licensing renewal fees for the hospital that they are a satellite of.

Q: Is this fee included in the main hospital licensure fee?

A: Yes.

- *Note:* A prorated fee was sent to all hospitals that currently have satellite emergency departments, in January of 2026, to ensure all fees are on the same renewal licensing fee schedule.

Application process:

Q: How do I submit an application for a Satellite Emergency Department?

A: Applications are processed through the provider portal at [DLBC provider portal](#).

Q: What are the steps when submitting the change request?

A: Steps below:

1. Submit a change request for the general hospital license that you would like to add a satellite emergency department.
2. Enter the name of the satellite location and indicate that it is a satellite emergency department.
3. Enter the address and phone number of the satellite location.
4. Upload the **city business license** of the satellite emergency department.

Q: Is there additional documentation that is required for the application?

A: Yes. You must also submit all the following as “Other Documentation” from your provider portal:

- **Leadership information:** Provide the name and contact information for each responsible decision-maker, including any owner or program or facility administrator.
- **Administrator qualifications:** Submit documentation verifying the administrator's qualifications.
- **Fire inspection:** A copy of the most recent fire inspection certificate.
- **Kitchen inspection:** A copy of your kitchen inspection (only required if the facility has a kitchen that serves food on-site).
- **Occupancy and zoning:** A Certificate of Occupancy and Zoning clearance. (Note: These constitute previous requirements typically completed prior to the facility becoming a satellite location, but proof may be requested).