

Healthcare Merchant Readiness Checklist

An evidence-first preparation guide for healthcare merchants, telehealth providers, pharmacies, digital health platforms, and related service organizations.

USE THIS GUIDE TO	PREPARE AN EVIDENCE PACKET
DESIGNED FOR	Healthcare merchants and payment-risk teams
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Important: This is an educational preparation guide, not a certification standard, legal opinion, regulatory determination, or promise of approval by SUPWM, a regulator, card network, payment provider, or advertising platform. Requirements vary by jurisdiction and business model. Confirm obligations with qualified counsel and the appropriate authorities.

Evidence preparation checklist

Mark each item when the evidence is current, internally consistent, and ready for secure review. Use N/A only after documenting why the item does not apply.

Business identity and ownership

Build a complete record of the organization and the people who control it.

- ☐ Current legal entity formation documents, registration number, DBA names, ownership chart, and principal contact details.
- ☐ Beneficial owners, controlling persons, officers, directors, medical leadership, and material disciplinary or enforcement history.
- ☐ Every active, parked, redirecting, campaign, patient-portal, checkout, and affiliated domain used by the business.
- ☐ Physical operating locations, service areas, fulfillment locations, and jurisdictions in which customers or patients are accepted.

Licensure and professional authority

Map each regulated activity to the entity, facility, and professional authorized to perform it.

- ☐ Current entity, facility, pharmacy, prescriber, practitioner, and controlled-substance licenses or registrations, as applicable.
- ☐ A jurisdiction-by-jurisdiction matrix showing where services are offered and which licenses support each service.
- ☐ Expiration dates, renewal status, restrictions, sanctions, corrective actions, and evidence of resolution where applicable.
- ☐ Written process for verifying licenses at onboarding and on a recurring basis.

Partners, affiliates, and the care pathway

Document every material third party involved in marketing, clinical care, prescribing, dispensing, fulfillment, technology, or payments.

- ☐ Executed agreements and current contact details for pharmacies, provider groups, laboratories, manufacturers, distributors, and fulfillment partners.
- ☐ A patient or customer journey map showing referrals, clinical decisions, prescriptions, payment, fulfillment, and support handoffs.
- ☐ Evidence that partner licenses and registrations are current and appropriate for the activities performed.
- ☐ All co-owned businesses, promotional partners, lead generators, agencies, affiliates, and domains they operate on your behalf.

Website, disclosures, and customer experience

Prepare the exact online experience a reviewer or monitoring system should evaluate.

- ☐ Public pages, logged-in areas, product catalogs, intake flows, checkout, payment pages, and post-purchase communications are accessible for authorized review.
- ☐ Legal business name, contact information, service area, pricing or material cost disclosures, refund/cancellation terms, and fulfillment expectations are clear.
- ☐ Privacy notice, terms of use, consent language, data practices, and security disclosures reflect actual operations.
- ☐ A test account and documented navigation path are available for restricted or member-only areas when authorized review is required.

Marketing and claims evidence

Create a claim inventory before an external reviewer or payment partner finds inconsistencies.

- ☐ Inventory all express and implied health, safety, performance, outcome, comparative, testimonial, and before-and-after claims.
- ☐ Attach the substantiation, approvals, labeling, limitations, and required disclosures supporting each material claim.
- ☐ Review websites, social accounts, paid ads, email, influencers, affiliates, scripts, and sales materials for consistent claims.
- ☐ Document an approval and monitoring process for new claims, promotions, products, and third-party marketing.

Privacy, security, and operational controls

Show that policy statements are backed by working controls.

- ☐ Identify whether regulated or sensitive health information is collected, stored, transmitted, or shared and document applicable safeguards.
- ☐ Maintain access controls, vendor inventory, retention rules, incident response, complaint handling, and breach escalation procedures.
- ☐ Reconcile the website privacy notice, consent mechanisms, tracking technologies, and data-sharing practices.
- ☐ Prepare evidence of recurring website, partner, license, claim, and product monitoring after approval.

Clinical and prescribing workflow

If diagnosis, treatment, prescribing, or dispensing is involved, document how clinical independence and patient safety are maintained.

- ☐ Clinical intake, identity checks, informed consent, evaluation standards, prescribing criteria, contraindication review, follow-up, and escalation procedures.
- ☐ How provider-patient relationships are established and how jurisdiction, age, location, and emergency limitations are handled.

- ☐ Medication sourcing, prescription transmission, dispensing, shipping, adverse-event, and recall processes where applicable.
- ☐ Controls preventing automatic approval, impermissible prescribing, unsupported treatment promises, and non-clinical interference.

Suggested review packet index

Keep the packet organized and versioned. Do not send credentials, protected health information, personal data, or sensitive records by ordinary email.

- ☐ 01 - Legal entity, ownership, DBAs, locations, and domain inventory
- ☐ 02 - Licenses, registrations, expiration dates, and verification evidence
- ☐ 03 - Products, services, jurisdictions, and business-model narrative
- ☐ 04 - Partner and affiliate roster, agreements, and oversight evidence
- ☐ 05 - Website journey, restricted-area access plan, terms, and disclosures
- ☐ 06 - Marketing claim inventory, substantiation, approvals, and monitoring
- ☐ 07 - Privacy, security, complaints, incidents, and corrective-action records
- ☐ 08 - Ongoing monitoring owner, cadence, escalation, and evidence retention

Reference starting points

These links are starting points only. Use the rules, guidance, and authorities applicable to the specific business and jurisdictions under review.

HHS HIPAA overview

<https://www.hhs.gov/hipaa/for-professionals/index.html>

FTC Health Products Compliance Guidance

<https://www.ftc.gov/business-guidance/resources/health-products-compliance-guidance>

FDA Registration and Listing

<https://www.fda.gov/industry/fda-basics-industry/registration-and-listing>

Ready to discuss an evidence-first merchant review?

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