SUPWM HEALTHCARE MERCHANT READINESS

Medical Spa Merchant Readiness Checklist

An evidence preparation guide for medical aesthetics, wellness clinics, weight-management programs, IV therapy, and hybrid in-person or telehealth models.

USE THIS GUIDE TO	**PREPARE AN EVIDENCE PACKET**
DESIGNED FOR	**Medical spas, clinics, acquirers, and PayFacs**
VERSION	**1.0 | August 2026**

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 governance and scope of practice

Show who makes clinical decisions, who performs each service, and why they are authorized to do so.

- [ ] Medical director agreement, supervisory structure, delegation protocols, standing orders, and corporate-practice analysis where applicable.
- [ ] Roster of physicians, advanced-practice clinicians, nurses, aestheticians, technicians, and contractors with services and jurisdictions mapped to each license.
- [ ] Written intake, informed consent, evaluation, contraindication, treatment, emergency, follow-up, complaint, and adverse-event procedures.

- [ ] Training, competency, equipment, infection-control, medication-storage, and quality-assurance records appropriate to each offered service.

Prescription products, compounding, and sourcing

Trace regulated products from the authorized source through patient administration or dispensing.

- [ ] Inventory of prescription drugs, compounded preparations, controlled substances, devices, biologics, and other regulated products used or promoted.
- [ ] Supplier, pharmacy, wholesaler, and distributor licenses plus invoices, agreements, pedigrees, or other sourcing records as applicable.
- [ ] Prescribing, ordering, receiving, storage, administration, dispensing, shipping, waste, recall, and adverse-event controls.
- [ ] Documentation supporting the lawful basis for compounded products, off-label clinical decisions, telehealth prescribing, and physician dispensing where applicable.

Service-specific website review

Confirm the public offer accurately reflects the clinical model and does not outrun the evidence.

- [ ] Review weight-management, hormone, peptide, IV infusion, injectable, device, regenerative, sexual-health, and longevity pages separately.
- [ ] Identify claims implying guaranteed outcomes, disease treatment, permanent effects, risk-free care, regulatory approval, or superiority and attach substantiation or revise.
- [ ] Make material risks, eligibility limits, clinician involvement, prescription requirements, pricing terms, recurring billing, and cancellation terms clear.
- [ ] Ensure testimonials, before-and-after images, influencer content, financing claims, and promotional offers include required context and are not misleading.

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.

FTC Health Products Compliance Guidance
https://www.ftc.gov/business-guidance/resources/health-products-compliance-guidance

HHS HIPAA overview
https://www.hhs.gov/hipaa/for-professionals/index.html

FDA Registration and Listing overview
https://www.fda.gov/industry/fda-basics-industry/registration-and-listing

State medical, nursing, pharmacy, and facility regulators
Confirm the authorities for every jurisdiction served.

Ready to discuss an evidence-first merchant review?

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