

GLP-1 Med Spa Compliance Kit

A pre-launch checklist and a marketing do and do-not list for med spas offering semaglutide or tirzepatide.

Pre-Launch Checklist

Before your first patient, have each of these in hand. Not in progress. In hand.

- ☐ **1. Medical oversight arrangement.** Medical director agreement, supervising physician, or your state's equivalent, reviewed by healthcare counsel in the last 12 months and specific to your state.
- ☐ **2. Scope of practice confirmation.** For every clinician who will prescribe, supervise, or administer, plus any state med spa registration or reporting requirements (for example, Indiana's registration, which opens January 1, 2027).
- ☐ **3. Pharmacy vetting file.** Complete if you will offer any compounded product, with license verification and written sourcing information.
- ☐ **4. Payment processor written approval.** For prescription weight-loss services, plus a backup plan.
- ☐ **5. Insurance review.** Confirm your current policy covers the service, or add a rider.
- ☐ **6. Consent forms.** Specific to the drug and the dispensing form (branded vs. compounded), reviewed by counsel.
- ☐ **7. Marketing review process.** One named person approves all GLP-1 content against FDA and state attorney general enforcement themes.
- ☐ **8. Staff training completion.** Documented for everyone from front desk to injectors.
- ☐ **9. Adverse event protocol.** Written, posted, and rehearsed.
- ☐ **10. HIPAA audit.** Of every tool that touches patient data.

Reviewed with counsel: Date _____ Initials _____

GLP-1 Marketing: Do and Do Not

State attorneys general in Ohio and Connecticut acted on compounded GLP-1 marketing in 2025, and FDA sent repeated waves of warning letters in 2025 and 2026. The common thread is accuracy about what the product is.

Do	Do Not
Describe the service clinically and accurately (e.g., medically supervised weight management program)	Call compounded drugs generic, FDA-approved, or equivalent to Ozempic, Wegovy, Zepbound, or Mounjaro
Be clear about which pharmacy compounds the product, if you offer a compounded product	Use private-label branding that obscures who is compounding the product
Describe any compounded product as individualized prescribing that follows a medical evaluation	Advertise compounded semaglutide or tirzepatide as a menu item for the general public (Connecticut treats this as potentially deceptive)
Use before-and-after photos only with written patient authorization and clear disclosure that results vary	Promise specific pounds lost, percentage results, or guaranteed outcomes
Disclose that prescription eligibility depends on medical evaluation	Imply the medication is available to anyone who pays
State pricing clearly, including what is and is not included	Use bait pricing (first dose price without disclosing full program cost)
Use the brand name only when referring to the actual branded product you dispense	Use brand names in ads for a compounded product, or claim a compounded product has the same active ingredient as a branded drug in a way that implies equivalence
Keep claims within the FDA-approved indication for the product you are prescribing	Market GLP-1 drugs for cosmetic purposes or promote off-label uses in consumer-facing advertising

Have one person on your team review all GLP-1 marketing before it goes out, with real veto authority.