



Baseline Inspection

Findings report

CLINIC

Sample Aesthetics Clinic

REPORT NO.

BP-SAMPLE-01

PROFILE

Fictional clinic • single location • California

REVIEW

Illustrative review • 7 days

SERVICES REVIEWED

Neuromodulators • dermal fillers • IV micronutrient therapy • semaglutide

3/7

DOCUMENTS VERIFIED

1

CRITICAL FINDING

5

SIGNIFICANT
FINDINGS

3

OBSERVATIONS

8

CHARTS SAMPLED,
DE-IDENTIFIED

How to read this report

Every finding starts with the document, then states what we saw, why it matters, the rule behind it, and the fix. Findings are graded by consequence: **critical** means act this week; **significant** means act this month. Observations need no action but are worth knowing.

What we reviewed

The seven documents a regulator typically asks for first, a sample of charts selected by date, the public website and social accounts, and the supervision calendar. Review was by supervised screen-share; no patient identifiers were collected.

BoardProof is independent: it sells no products, software or medical director services and takes no referral fees. BoardProof is not a law firm and this report is not legal advice.

Document scorecard

DOCUMENT	STATUS	FINDINGS	OBSERVATIONS
Medical director agreement	FINDINGS	F-02	—
Fictitious name permit	VERIFIED	—	0-2
Staff license verification	VERIFIED	—	0-3
Protocols & standing orders	FINDINGS	F-03	—
Chart sample	CRITICAL FINDING	F-01, F-06	—
Advertising & photo consents	FINDINGS	F-04, F-05	—
Drug purchase records	VERIFIED	—	0-1

FIX FIRST

- F-01

CRITICAL

Good faith examination missing or out of order
- F-02

SIGNIFICANT

Supervision described in the agreement is not evidenced
- F-03

SIGNIFICANT

Standing orders predate the current menu

- VERIFIED

Produced, current, and consistent with what we observed in practice.
- FINDINGS

Produced, but at least one significant gap between the document and practice.
- CRITICAL FINDING

A gap that should be closed before anything else.

Findings

F-01

CRITICAL

CHART SAMPLE

Good faith examination missing or out of order

WHAT WE FOUND

Of 8 sampled first-treatment encounters, one records the examination two days after the neuromodulator was administered. For a second, no examination record was produced at all.

WHY IT MATTERS

Prescribing or furnishing a dangerous drug without an appropriate prior examination is unprofessional conduct. The examination has to come first, and it has to be performed by a physician, nurse practitioner or physician assistant.

Bus. & Prof. Code § 2242(a)

THE FIX

No first treatment without a signed examination already in the chart: add a hard stop in the scheduling or charting system, then review every first treatment from the past 90 days and document what you find.

SHOWN IN FULL AS AN EXAMPLE

Owner

Target date

Closed

F-02

SIGNIFICANT

MEDICAL DIRECTOR AGREEMENT

Supervision described in the agreement is not evidenced

WHAT WE FOUND

The agreement commits the medical director to four hours on site each month and a monthly review of 5% of charts. Records produced show two site visits in six months and no chart-review log.

WHY IT MATTERS

When the paper promises supervision the calendar can't show, a regulator reads the calendar. A comparable case in December 2025 ended in a \$10,000 fine for a med spa's medical director.

Comparable enforcement: Iowa Board of Medicine, Dec 2025

THE FIX

PROVIDED IN THE CLIENT REPORT

Owner

Target date

Closed

Standing orders predate the current menu

WHAT WE FOUND

Standing orders are dated 2022 and signed by the previous medical director. They do not cover IV micronutrient therapy or semaglutide, both added to the menu in 2025.

WHY IT MATTERS

Registered nurses performing delegated medical functions do so under standardized procedures that must be current, approved and reviewed. An order signed by someone no longer supervising covers nothing.

Bus. & Prof. Code § 2725 · 16 CCR § 1474

THE FIX

PROVIDED IN THE CLIENT REPORT

Owner

Target date

Closed

Open-ended price claims

WHAT WE FOUND

The website lists neuromodulator treatment “from \$9/unit” and filler “starting at \$299,” with no upper bound on either.

WHY IT MATTERS

California's professional advertising rules restrict how prices may be stated. Open-ended floors are among the most common advertising issues we see.

Flagged for review against Bus. & Prof. Code § 651

THE FIX

PROVIDED IN THE CLIENT REPORT

Owner

Target date

Closed

Before-and-after images without authorization on file

WHAT WE FOUND

Of 11 before-and-after images on the website and Instagram, 4 have no signed patient authorization on file. One image appears to have been edited: background and skin tone differ between the two frames.

WHY IT MATTERS

Patient photographs are medical information and need written authorization before use. Images that do not accurately depict results can make an advertisement misleading.

Civ. Code § 56.11 · Bus. & Prof. Code § 651

THE FIX

PROVIDED IN THE CLIENT REPORT

Owner

Target date

Closed

Treating clinician not identifiable

WHAT WE FOUND	Three of the 8 sampled entries are signed with initials only. None of the three can be tied to a specific license from the chart alone.
WHY IT MATTERS	Failing to keep adequate and accurate records is itself unprofessional conduct, independent of whether the treatment was appropriate. Bus. & Prof. Code § 2266
THE FIX	PROVIDED IN THE CLIENT REPORT

Owner _____ Target date _____ Closed ☐

PART 3

Observations

- 0-1

Drug purchase records
Invoices trace to a licensed distributor. We recommend a lot-to-invoice log for neuromodulators, given federal warnings about counterfeit botulinum toxin in 2024.
- 0-2

Fictitious name permit
Permit current and matches the practice address. Renewal falls due within 90 days, so calendar it now.
- 0-3

Staff license verification
All five clinical licenses current and matched to role. The nurse practitioner's furnishing number is on file.

Chart sampling log

REF	MONTH	SERVICE	RESULT
C-01	Jan	Neuromodulator	No finding
C-02	Jan	Filler	Initials only · F-06
C-03	Feb	Neuromodulator	Exam after treatment · F-01
C-04	Feb	IV therapy	No finding
C-05	Mar	Semaglutide	Initials only · F-06
C-06	Mar	Neuromodulator	No exam produced · F-01
C-07	Apr	Filler	No finding
C-08	Apr	Neuromodulator	Initials only · F-06

Data handling

Charts were reviewed de-identified or by supervised screen-share. No names, dates of birth or contact details were collected. Any patient information received is destroyed within 30 days of this report.

What happens next

A findings walkthrough, then re-verification of each closed finding on request. Ongoing clients are re-verified quarterly, with advertising reviewed monthly.

Limitations. This report records what was produced and observed during the review window. It is not legal advice, does not create an attorney-client relationship, and does not predict or guarantee the outcome of any inspection, investigation or complaint. Rule references identify the basis for each finding; confirm specific legal questions with your own counsel. **This sample describes a fictional clinic.** Its findings are composites modelled on publicly reported enforcement patterns and are not drawn from any BoardProof client.