

GLOBAL PRAIRIE



INTEGRATED MARKETING COMMUNICATIONS

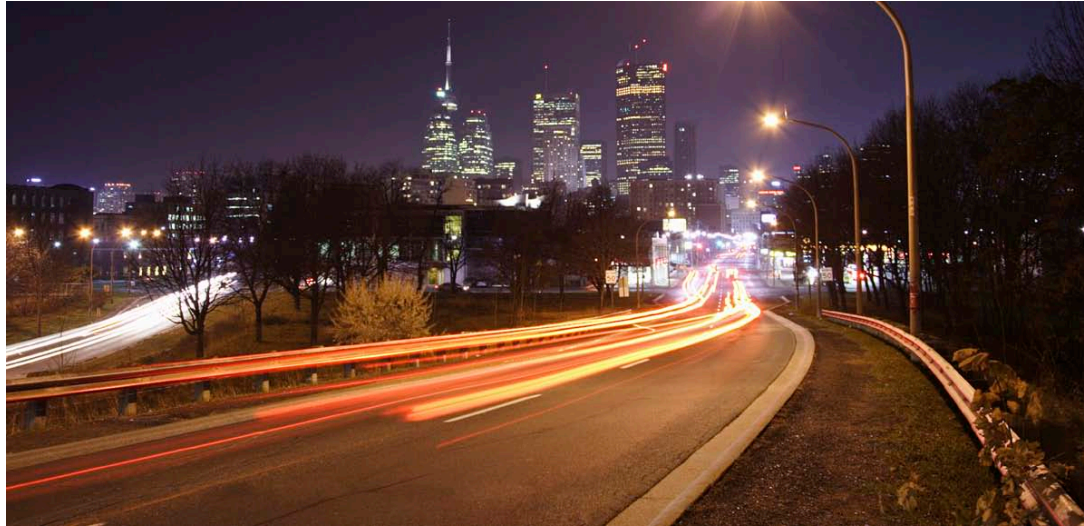
**Promotion of Food and Drug  
Administration-Regulated Medical  
Products Using the Internet and Social  
Media Tools**

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# Guide Rails

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Guiding the appropriate use of promotional activities within social media platforms

***In a patients-centric manner,***

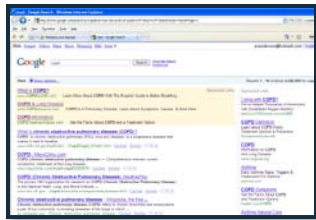
***With complete transparency,***

***Authenticity,***

***and acknowledgement of social media norms and user experiences***

# Levers of Influence

## Share of Conversation?



SEM/SEO



## Social media influencers?



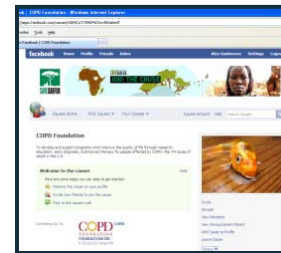
Micro blogging



Patient Advocacy sites



Health Portals

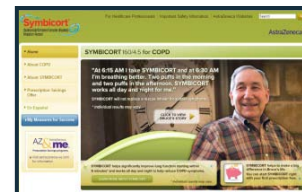


Social Communities



Video sharing

## Size and presence of advocacy groups?



Product and unbranded support sites

## Company sponsored brand.com's

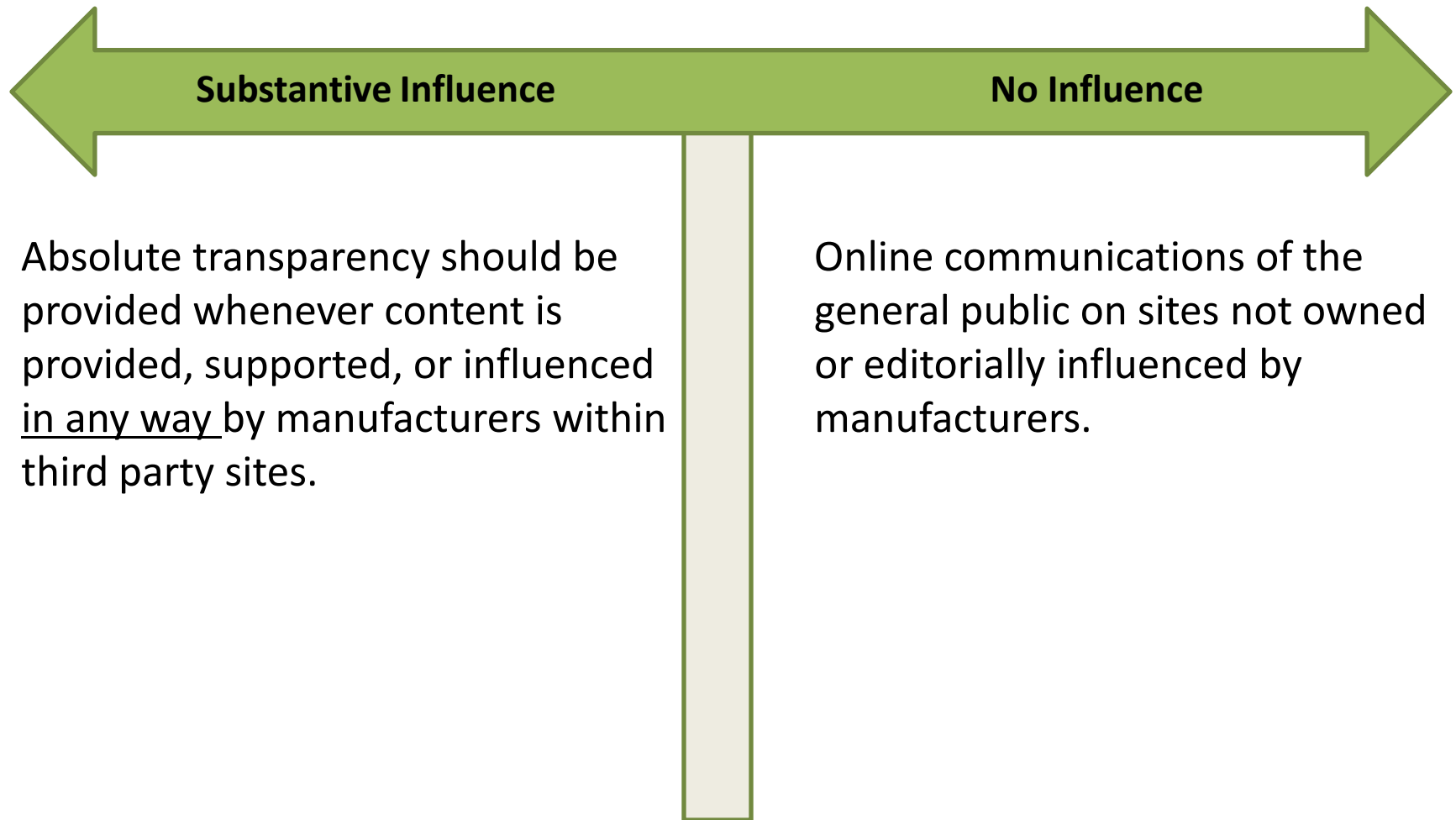
# Topics for Discussion

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- The extent to which manufacturers are accountable for product information online.
- Fulfilling regulatory requirements - How fair and balanced information should be presented in light of unique nature of social media platforms.
- Corrective actions - The parameters for correcting inaccurate product information.

# Accountability and Influence – Third Party Communications

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# Substantive Influence

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- Accountable
- Source of influence should be made clear within the context of the communication.
- Appropriate links should also be provided within the clarifying statement so users can easily link to sponsoring party
- Practice 'full disclosure' of any and all material connection between brand and influencer/blogger, enforce influencers to properly disclose.

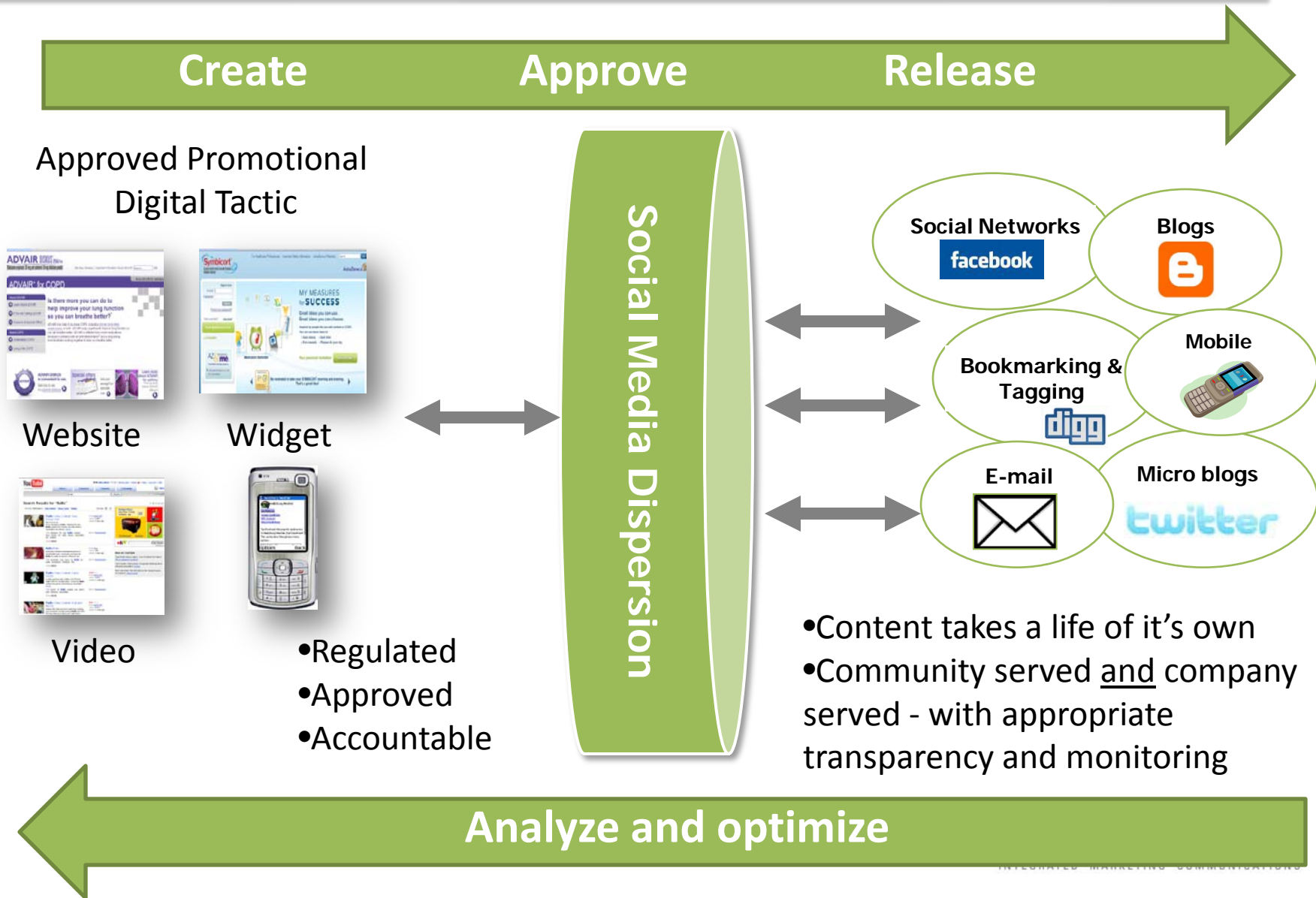
# No Influence

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- No accountability
- Support the ever growing, free and open nature of social media health conversations
- Consider ways for manufacturers to thoughtfully advertise within these conversations to offer regulated information and improve health literacy.
- Intuitive use of “bright line” differentiation between community conversations and legitimate, credible, and regulated product information and support.

# Social Media Cycle – Rinse and Repeat (as needed)



# Consideration Matrix: Platforms, Approaches, and Guidelines

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Platform	Approach	Guideline Considerations*
<b>Social Networks</b> (Facebook , company, etc)	<ul style="list-style-type: none"> <li>•Corporate branded</li> <li>•Product branded</li> <li>•Condition - unbranded</li> </ul>	<ul style="list-style-type: none"> <li>•Fair and balanced content</li> <li>•Implicit Links</li> <li>•Wall posts and commenting</li> </ul>
<b>Micro blogging</b> (twitter)	<ul style="list-style-type: none"> <li>•Corporate branded</li> <li>•Condition – unbranded</li> <li>•Individual</li> </ul>	<ul style="list-style-type: none"> <li>•Character limitations</li> <li>•Hash tags</li> <li>•Shortened URL's</li> <li>•Commands and lists</li> </ul>
<b>Video portals</b> (YouTube)	<ul style="list-style-type: none"> <li>•Corporate branded</li> <li>•Condition – unbranded</li> <li>•Product branded</li> </ul>	<ul style="list-style-type: none"> <li>•Sponsored by channels</li> <li>•Video safety information</li> <li>•Video fair balance</li> <li>•Commenting and ratings</li> </ul>
<b>Patient Blogs</b>	<ul style="list-style-type: none"> <li>•Influenced</li> <li>•Non-influenced</li> </ul>	<ul style="list-style-type: none"> <li>•Implicit “Sponsored by”</li> <li>•Links</li> <li>•Full disclosure language</li> </ul>

\*determine necessity, if any, to re-submit online communication material to FDA

# Correcting Misinformation

Parameters to determine the appropriateness of correcting misinformation and/or scope of information a company can do to correct misinformation on a site outside a company's control.

## Check the source!

Source of misinformation	Issues to analyze	Corrective action
<b>Blogs</b>	<ul style="list-style-type: none"><li>•Intended audience and reach</li><li>•Blogger influence "value"</li><li>•Purpose and context</li><li>•Original "source"</li></ul>	<ul style="list-style-type: none"><li>•Corrective statement</li><li>•Appropriate links</li><li>•Graphical call outs</li><li>•Existing company site networks</li></ul>
<b>Video sharing sites</b>	<ul style="list-style-type: none"><li>•Intended audience and reach</li><li>•Views</li><li>•Original "source"</li></ul>	<ul style="list-style-type: none"><li>•Corrective video</li><li>•Appropriate links</li></ul>
<b>Social Networks</b>	<ul style="list-style-type: none"><li>•Member type</li><li>•Exposures</li><li>•Purpose and context</li><li>•Original "source"</li></ul>	<ul style="list-style-type: none"><li>•Member/company response</li><li>•Appropriate links</li><li>•Graphical call-outs</li></ul>
<b>Micro blogging</b>	<ul style="list-style-type: none"><li>•Original "source" and context</li><li>•Member profile</li><li>•Followers/lists</li></ul>	<ul style="list-style-type: none"><li>•Credible company member</li><li>•Corrective response with link to full clarifying page/video</li><li>•Hash tags if appropriate</li></ul>

# Conclusions

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- Consumers are vested in decision-making around healthcare. An overwhelming volume of information is available via disparate channels ranging from unorganized and unfiltered to edited and authoritative (no single, trusted source of consolidated healthcare information).
- Consumers will need assistance in integrating available data, and to separate the signal from the noise, to help drive decision making
- High level of transparency is expected and needed to garner trust.
- Guidelines should evolve as platforms and tools change – and they certainly will.

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# Thank You

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