



# Public Hearing on Promotion of FDA-Regulated Medical Products Using the Internet and Social Media Tools

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# Objectives of this Presentation

- Provide the FDA with data (in aggregate and blinded format) related to Topic #4 “***When is the use of links appropriate?***”.
- In presenting this data we will provide insights concerning the frequency with which users actually click on different categories of links (e.g., banner ads, links within Web sites, sponsored links, organic search result links, etc.) to get additional information about products, and how in turn those links impact a user’s content consumption behavior on a manufacturer’s product Web site (“Brand.com”).

# Retrospective “Study” Conducted to Inform Topic #4

***“A multi-year, cross-brand review  
of how users find Brand.com  
Web sites and the impact of the  
referring source on a user’s  
content consumption.”***

# About the Investigators: **Ignite Health**

- Location: Irvine, CA, and New York, NY
- Services: Digital Strategy, Development, Animation, Online Promotion, Metrics/Analytics
- Major Clients\*:



GILEAD



**Abbott**  
A Promise for Life



**Cephalon**



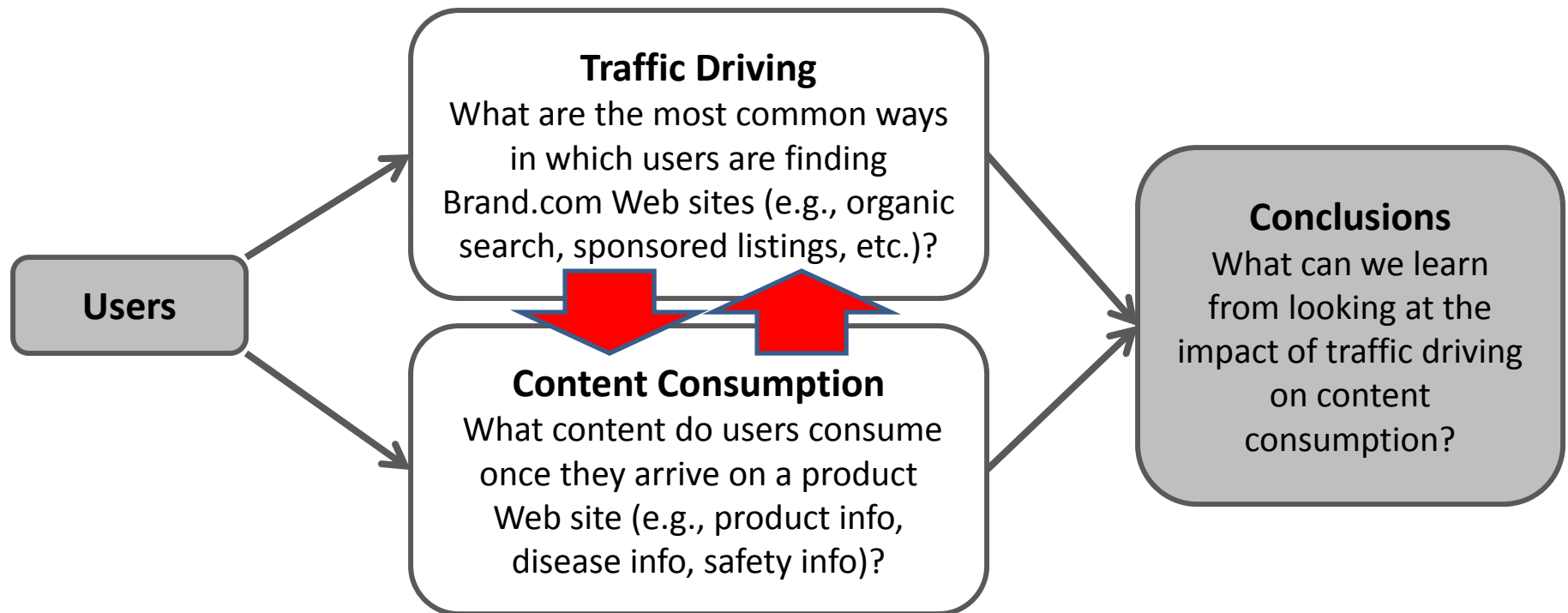
*Johnson+Johnson*

- Time Monitoring: 9+ years
- Web Sites Launched: 300+

# Study Objectives

- Understand the **type of traffic drivers** (e.g., direct URL inputs, search engine, etc.) most commonly used by users to find Brand.com Web sites
- Understand the **type of content** (e.g., product information, disease information, safety-related information, etc.) users are consuming on Brand.com Web sites
- Understand *if* and *how* the referral source (e.g., direct links, paid, natural search, etc.) influences post-click user behavior, particularly concerning the **consumption of safety-related information**
- Analyze the data to determine whether the requirement for inclusion of “fair balance” statements in “Product Claim” ads in the context of sponsored search listings (e.g., no “one-click” to safety information) will result in a “safer” health consumer

# Study Methodology



## Criteria for **Brand.com** Web site inclusion

1. >20,000 unique visitors per site
2. >12 months worth of data per site
3. Ignite played an active role in:
  - Web site development
  - Management of traffic-driving initiatives
  - Metrics/analytics

## Study **Sample Size**

- 10 Brand.com Web sites
- 5 years of data (2005 – 2009)
- 4,000,000+ unique visitors
- 500+ referral sources
- 100,000+ keyword/phrase referrals from search engines

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# *Definition of **Key Terms***

## Key Study Terms: *Traffic Drivers*

- **Direct URL Inputs:** people typing a Web site address directly into their Web browser
- **Organic Search:** natural search results that occur as a result of search engine optimization (“SEO”)
- **Sponsored Search Listings (“Paid Search”):** paid search results that occur as a result of advertiser purchasing keywords and crafting specific messages to appear when specific keywords are entered in search engines

# Key Study Terms:

## *Content Categories on Brand.com*

- **Product-related:** information about a product and its benefits (how a product works, benefits, dosing/administration information, etc.)
- **Disease-related:** information about the disease a company's product treats or other support information (disease education, reimbursement information, caregiver support, etc.)
- **Safety-related:** information about product safety (important safety information, patient prescribing information, side effects of treatment, etc.)

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# *Study Findings*

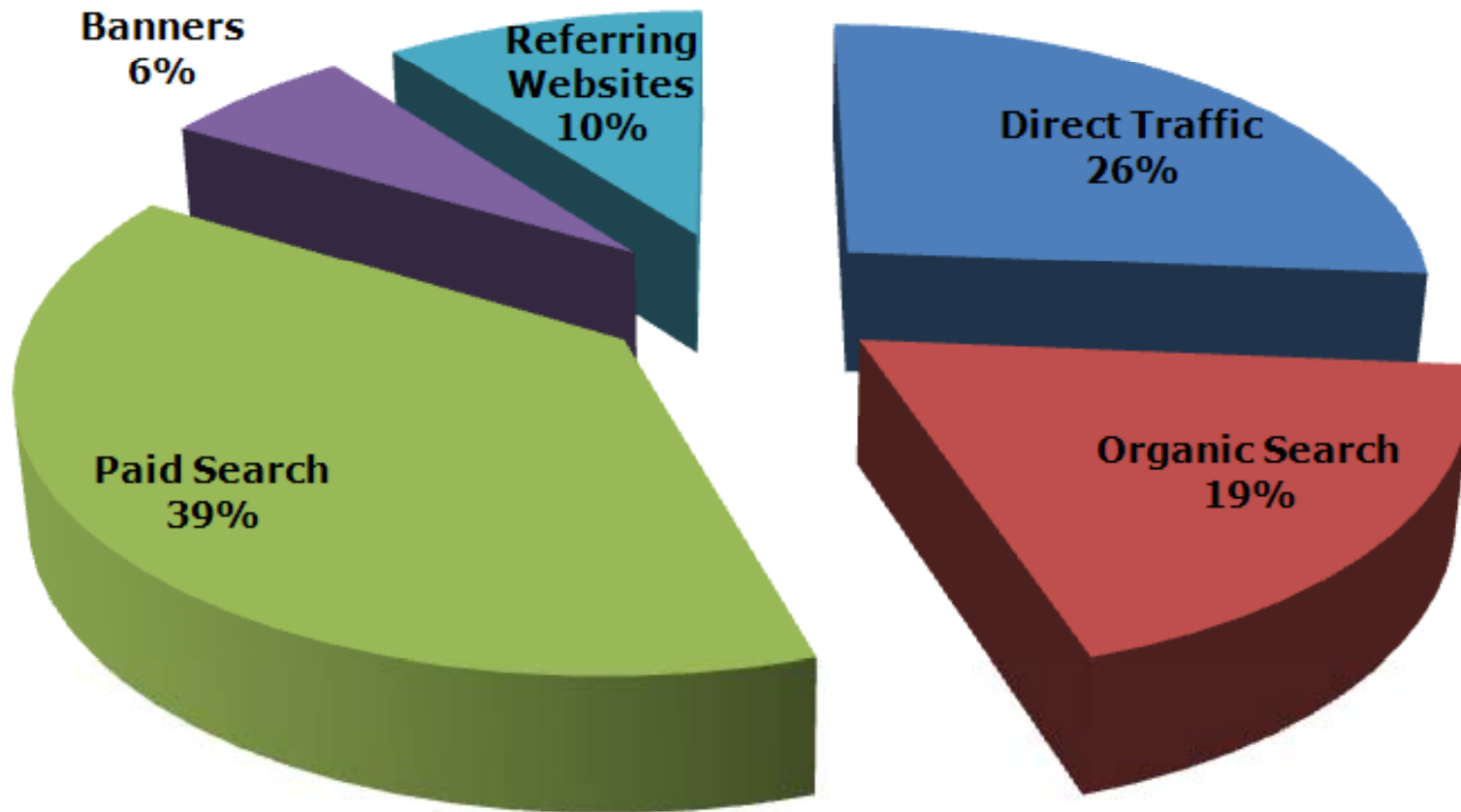
## Summary of Our Findings

- “Branded” sponsored listings (aka “Product Claim” ads) *directly* and *positively* impact consumers’ exposure to and consumption of safety-related information.

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# ***Study Results: Traffic Drivers to Brand.com***

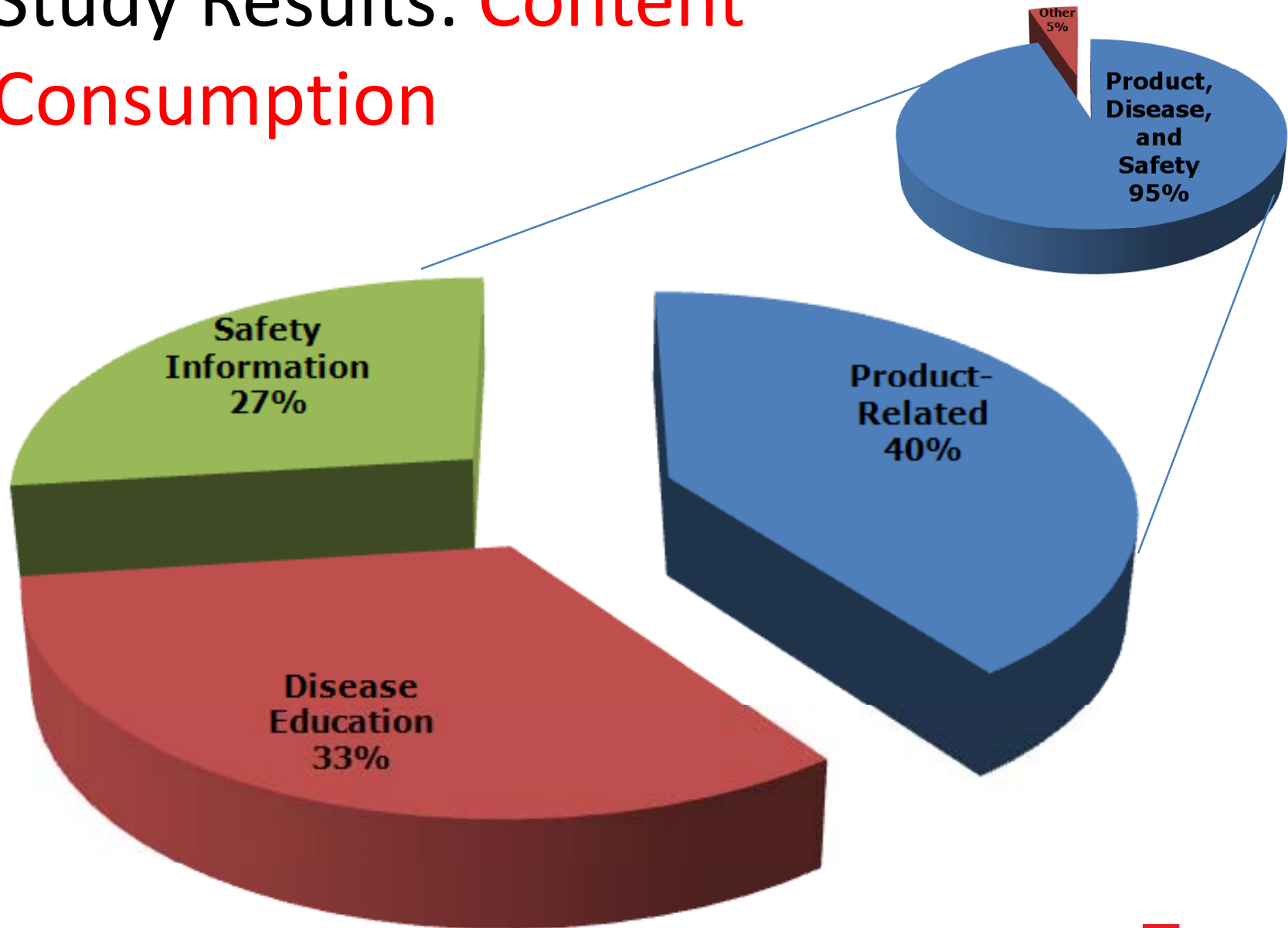
# Study Results: Traffic Drivers



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# ***Study Results: Brand.com Content Consumption***

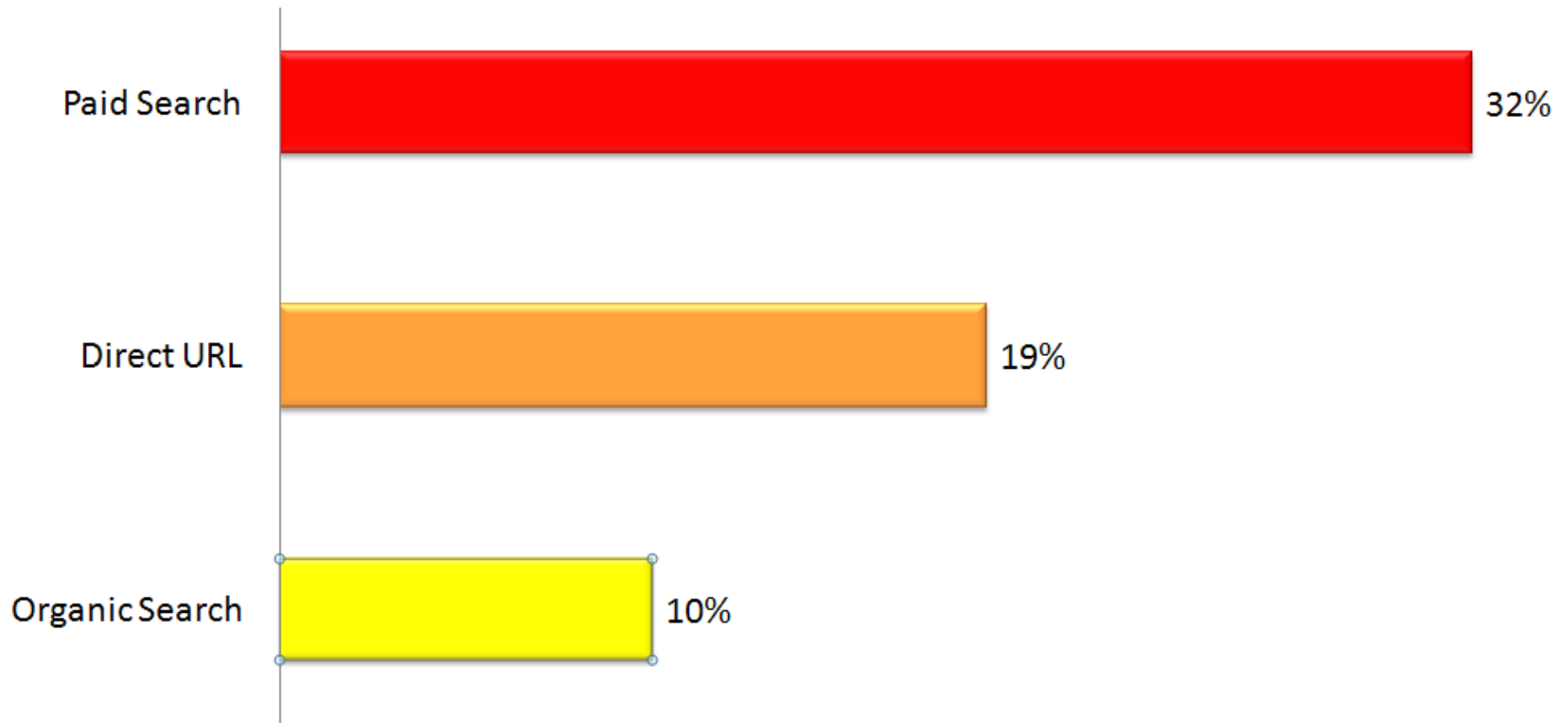
# Study Results: Content Consumption



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***Study Results: Traffic Drivers'  
Impact on Brand.com Content  
Consumption***

# Impact of *Referral Source* on the Consumption of *Safety-related Information* on a Brand.com Web site



# Impact of Ad “Type” on Click-Through Rates

*An analysis of 50 PPC campaigns was conducted to understand how ad-types affect click-through-rate (CTR). Historic data was pulled from 2005-2009.*

Product Claim Ads	Reminder Ads	Help-Seeking Ads
13.85% Average CTR	5.45% Average CTR	1.05% Average CTR

The results showed that product claim ads received:

- **154%** higher CTR than “Reminder” ads
- **1219%** higher CTR than “Help-Seeking” ads

# Summary of Our Findings

- Search engines (organic and sponsored listings) are the **most significant traffic driver** to Brand.com Web sites, accounting for **58%** of all traffic
  - Paid search, when active, drives **38%** of all traffic
- **27%** of all visitors to Brand.com Web sites will look at safety-related information
- Visitors driven from paid search ads are **more likely** to look at safety-related information (**32%**) versus those driven by either direct URL (**19%**) or organic search listings (**10%**)
- “Branded” sponsored listings (“Product Claim” ads) garner significantly higher click-through rates (**13.85%**) when compared to “Helping Seeking” ads (**1.05%**) and “Reminder” ads (**5.45%**), resulting in a higher volume of users getting to Brand.com Web sites **and** consuming safety-related information

# Our Underlying Assumption

- The more consumers are exposed to safety-related information surrounding pharmaceutical brands, the better informed they are of the benefits and risks associated with specific therapies, which *should* result in a more constructive patient-doctor dialogue, more appropriate self-identification regarding the appropriateness of a specific therapy for their condition (within the context of their lifestyle), better medication adherence and compliance, heightened sensitivity and awareness to potentially harmful and unintended side-effects of medications, and ultimately a...

***safer, healthier patient.***

# Study Implications

- Recent changes in paid search marketing strategies resulting from the warning letters issued by the FDA in March have resulted in the diminished presence of paid search advertising from approved brands
- This has resulted in:
  - Significant decrease in paid search traffic to Brand.com Web sites
  - Diminished percentage of consumers viewing safety-related information
- Even if pharmaceutical companies return to their normal “spend” levels for paid search, the explicit language regarding the requirement of “fair balance” in “Product Claim” sponsored ads make such ads impossible to deploy within the context of today’s sponsored listing space limitations. This in turn is likely to result in significantly **reduced** traffic to Brand.com Web sites, which (based on the data presented) will also result in fewer consumers viewing safety-related information associated with brands
- Future FDA guidelines regarding sponsored listings in search engines should consider the positive impact that “Product Claim” ads have on exposing a greater number of consumers to safety-related information

# Moving *Forward*

- A call for increased transparency, research, and industry-wide collaboration
  - Search engine companies have significantly more data that can help to **validate** the data we have presented
  - Collectively, we (agencies, media companies, pharmaceutical companies, device manufacturers, etc.) have significantly more data regarding the impact of referral sources on content consumption – **let's connect the dots!**
  - More studies need to be done on the positive or negative impact of “Product Claim” sponsored search listings **before** guidelines are issued that (continue to) make these impossible to implement
  - More focus should be placed on whether the current ways in which safety-related information is presented **on** Brand.com Web sites is, in fact, effective in communicating the benefits and risks of medication

# *Thank you for Listening*

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