



FDA

Internet &
Social Media
Hearing

2009

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www.twitter.com/intouchsol

<http://tiny.cc/IntouchsolFacebook>

www.myspace.com/intouchsolutions

Day 2, Question #2
November 13, 2009

Introduction

- > Intouch Solutions
- > 11 years of online pharma
 - > 100+ pharma Web sites
 - > ~3 million visits in 2009
 - > Sites, search, banner ads, social media, mobile, email, databases
 - > Consumer & professional



Influence of Internet on Public Health

- > Consumers have unprecedented access to health information via the Internet
 - > Accurate
 - > Inaccurate
- > The Internet is:
 - > Consumers' #1 source for health info
 - > Referenced before and after Dr. visit
 - > At every stage of condition

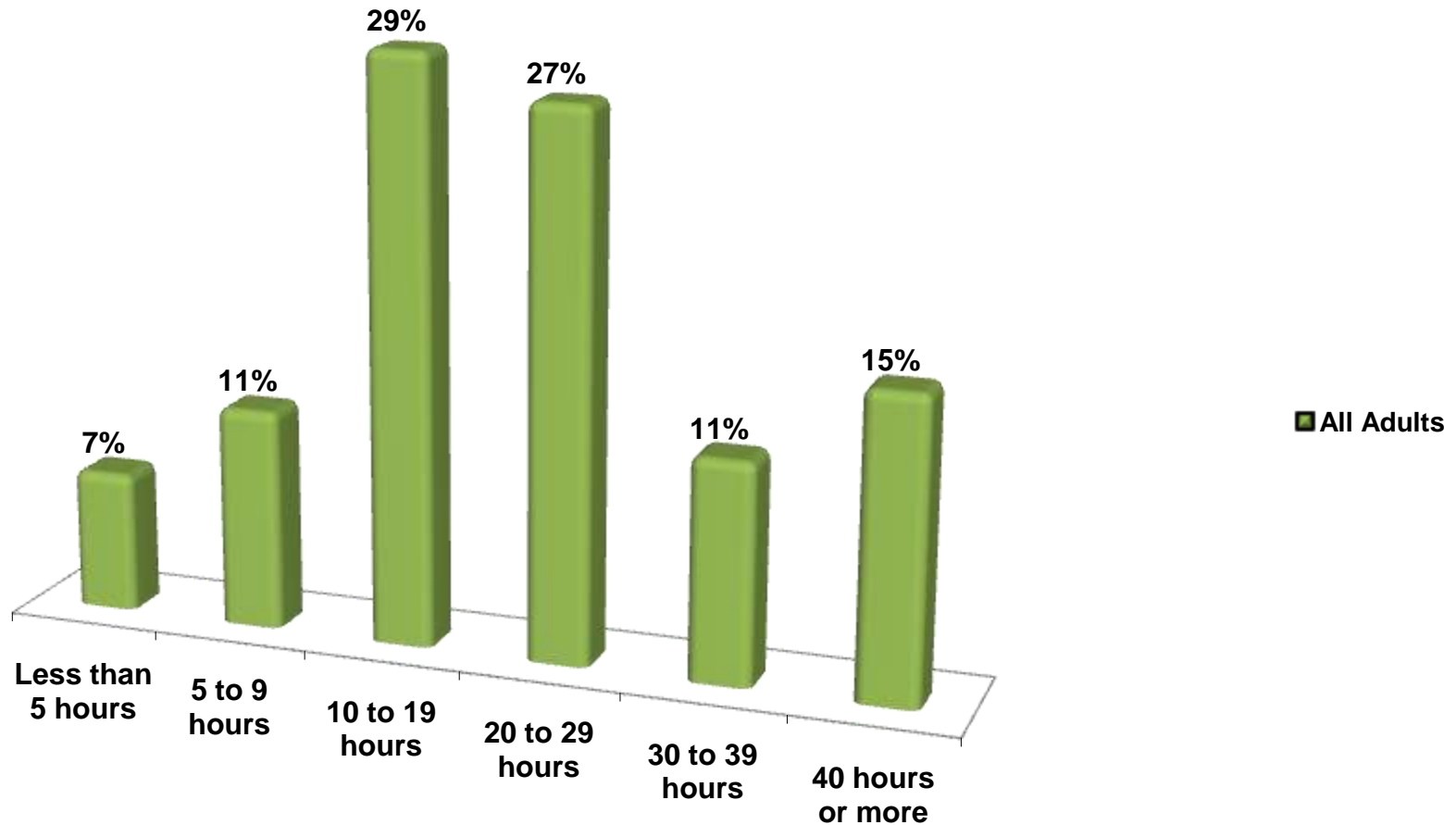


The Influential Internet

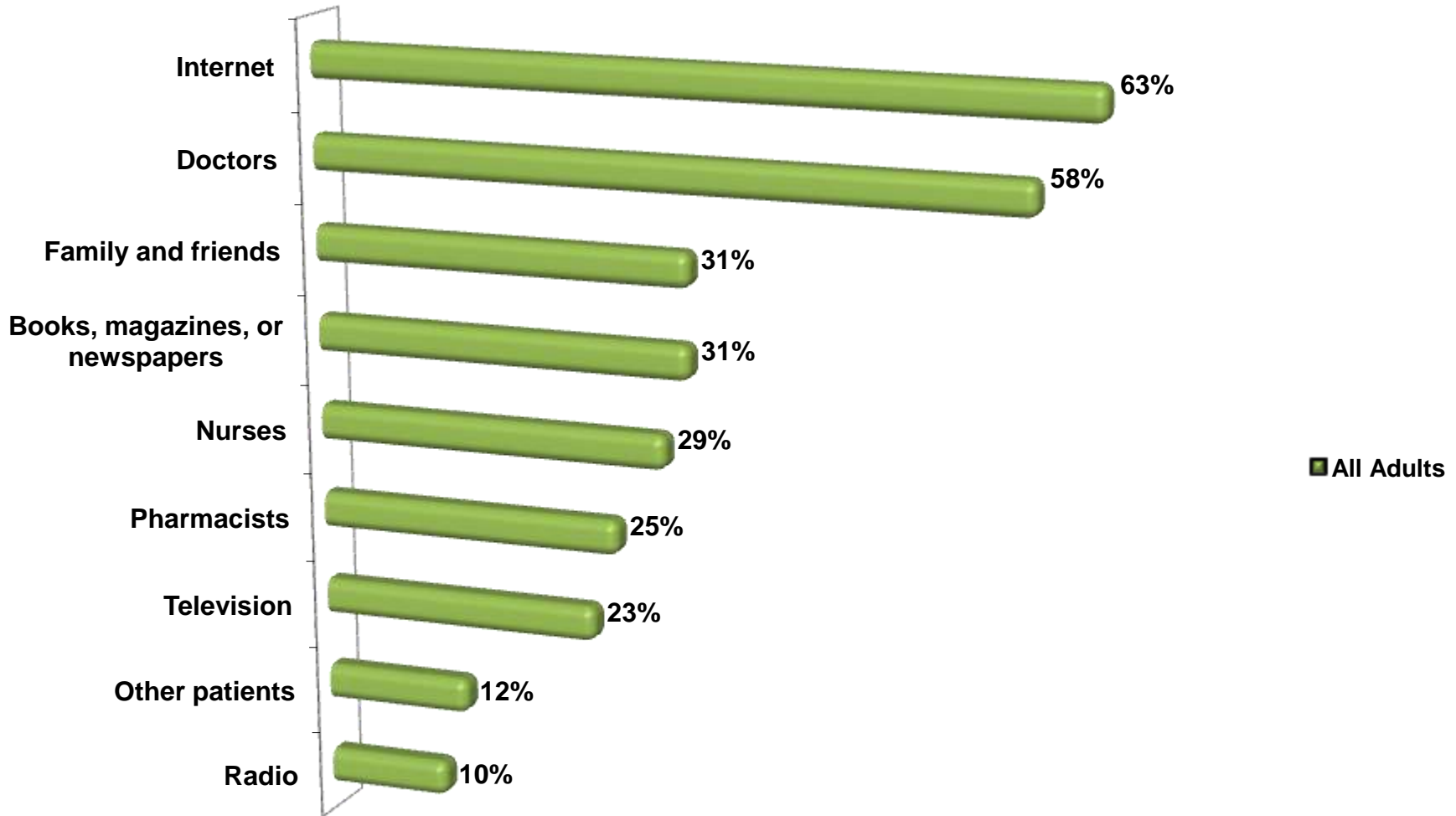


Obama stimulus package allocates \$20 billion to healthcare IT

Over 1/2 of Adults Spend > 20 hrs/week Online



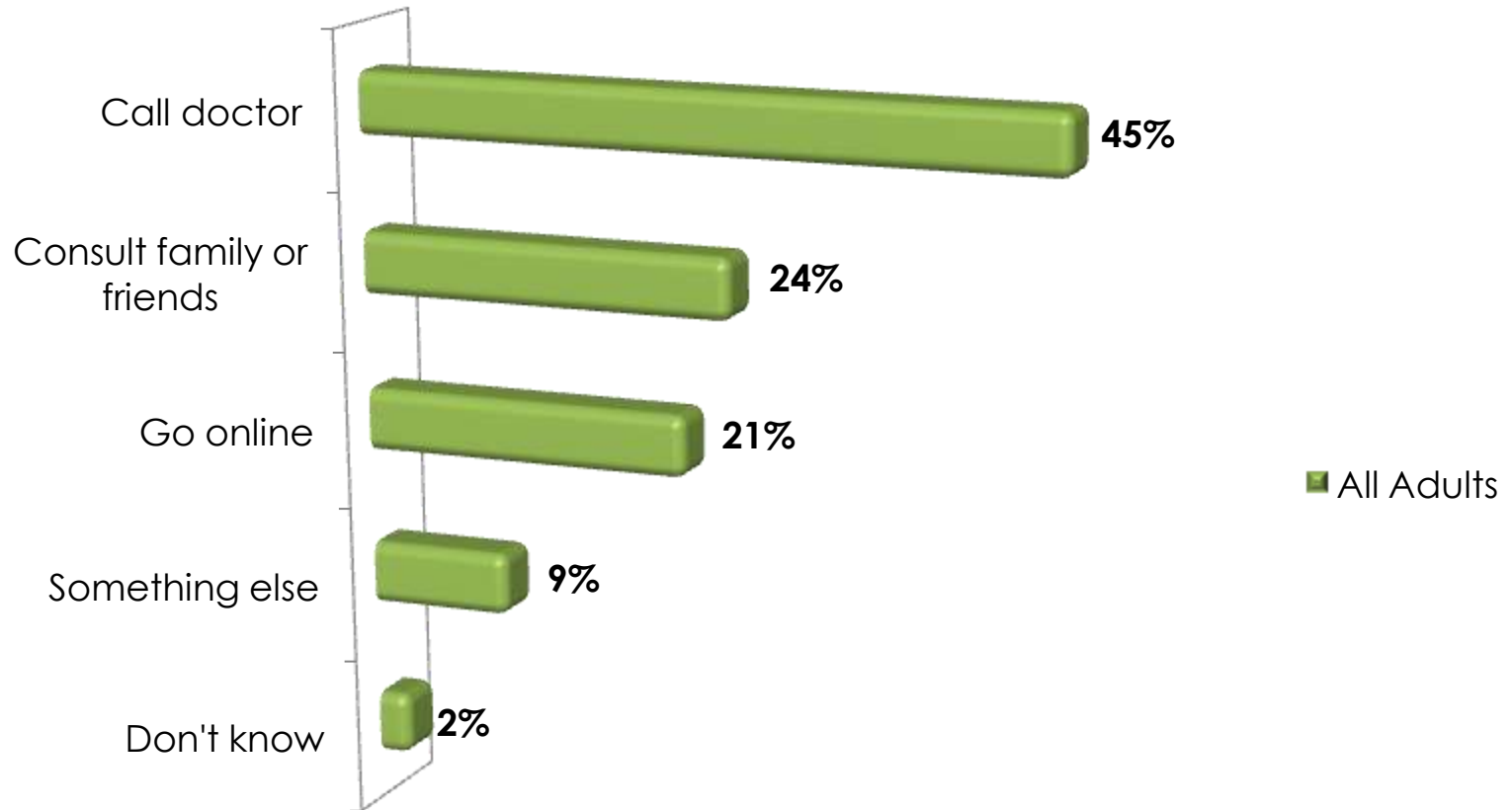
Internet: #1 Source for Obtaining Medical Info (Past 12 Months)



Among those who are online
Source: Cybercitizen Health™ v8.0—Q3 2008

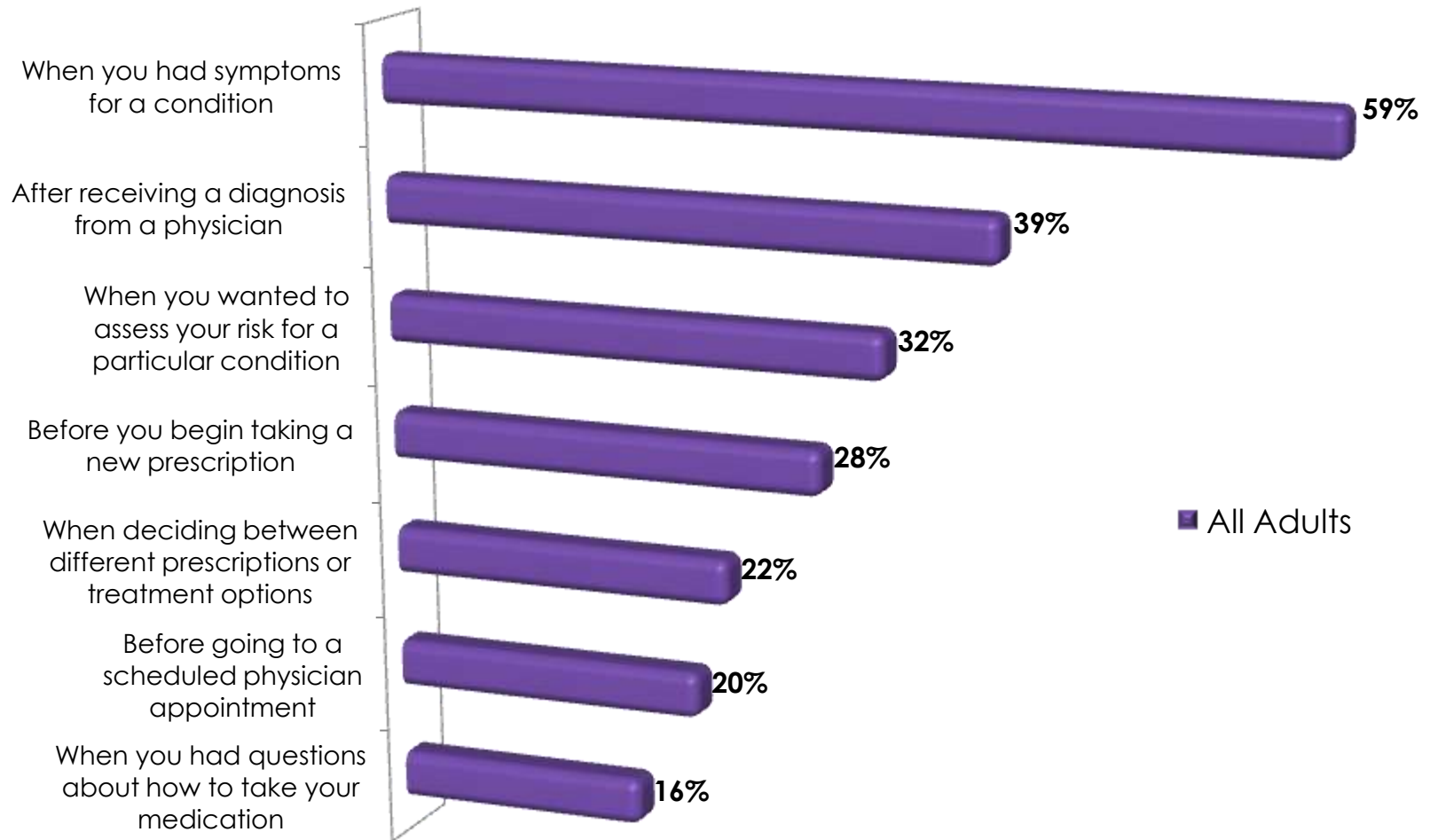
Online Research Comparable to Family Consultation

When you become aware of a health or medical issue what is the first thing you do?



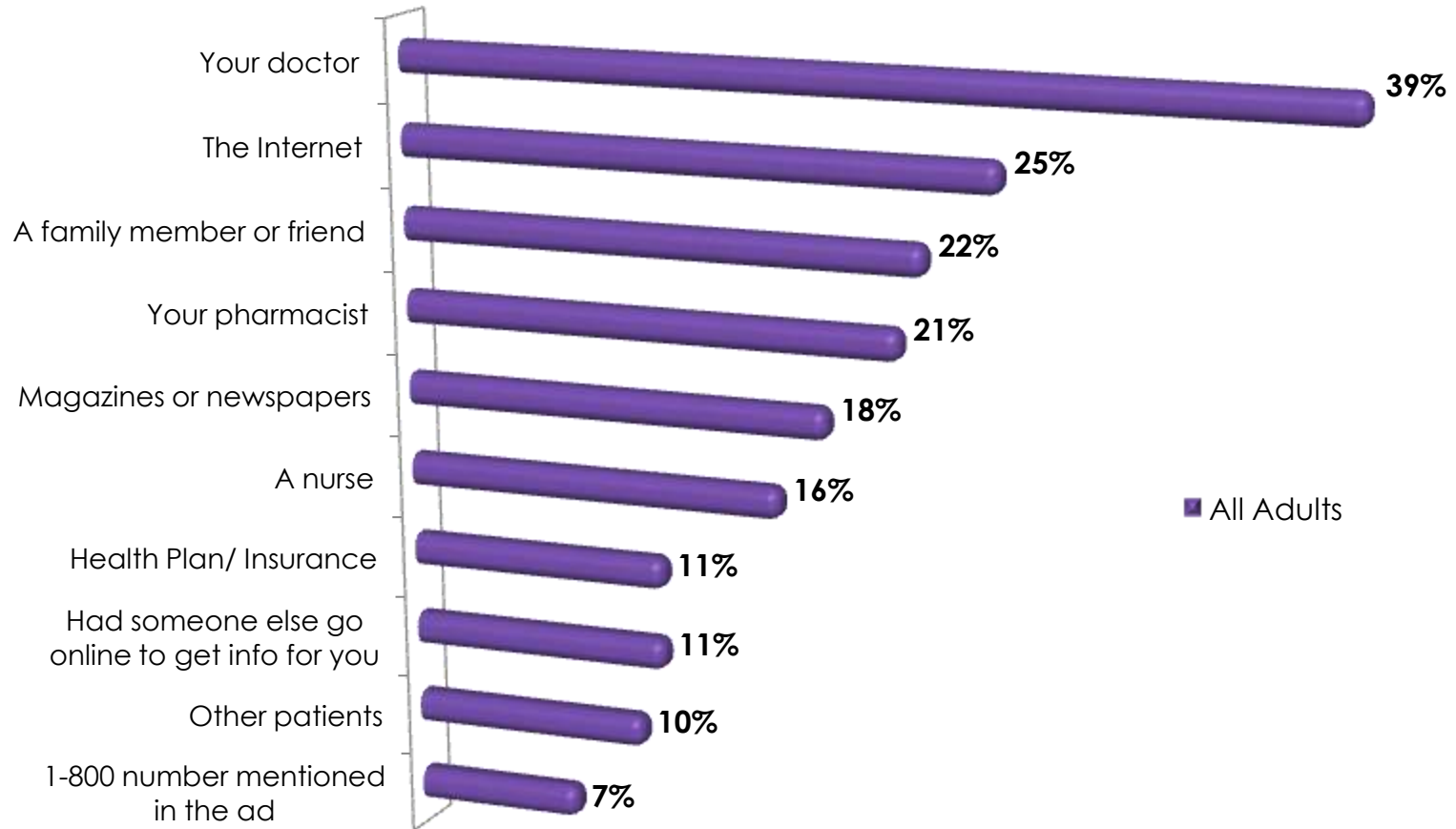
Patients Online at Every Stage of Condition

During which of the following situations have you looked online for health-related information?



Online: #2 Post-DTC Source to Gather Additional Information

Have you used this source to gather additional information relevant to the prescription drug(s) that you saw or heard advertised?



Not All Information is Reliable

Not All Recommendations are Safe

- **Save Huge on Rx ED Meds**

CanadaDrugCenter.com/Viagra - 100Mg 20Tabs \$99. Save Big Price Beat and Product Guarantee.

Acai Slim
The Secret Of The Amazon

feel healthy and vibrant with the
POWER OF ACAI BERRIES

- Clinically proven ingredients
- Lose unwanted weight
- Boost

CLICK HERE TO SEE IF YOU QUALIFY

"Alt Cancer Treatments"

12 Alternative Cancer Treatments
Your Dr Doesnt Even Know About!

ultimate-cancer-breakthroughs.com

Peanut oil for Pain

Try this effective pain relief
product using peanut oils.

www.FortexRubbingOil.com

A good Detoxifying routine see www.herbdoc.com

My chiropractor recommends this, especially for people with auto-immune issues. While I haven't personally tried it, my husband has and feels great since doing it. I plan to start soon.

Notices of Violation

- > March 2009: 14 Notice of Violation Letters for Search Advertising
- > Pharma co's left with 2 choices:

1. Place unbranded search ads only; remove all ads that mention brand names

2. Remove all search advertising altogether

Unbranded Ads Only

- > Unbranded vanity URLs link to branded sites
 - > Search engines made exception to pharma
- > Largely considered a “worst practice”
 - > Consumers consider bait-and-switch
 - > Don't land where they thought they were clicking
 - > Trust is eroded

In the Absence of Pharma Ads

Web Images Videos Maps News Shopping Gmail more ▼



lexapro

Search

Advanced Search

Web [Show options...](#)

Results 1 - 10 of about 7,440,000 for **lexapro**. (0.08 seconds)

[Depression & Anxiety](#)

www.Help-Treat-Anxiety.com

There's a Drug for Both Depression And

[Treatment for Depression and Anxiety: Lexapro \(Escitalopram ...](#)

Lexapro Official Site - Find facts about treatments for depression and generalized anxiety disorder (GAD).

www.lexapro.com/ - [Cached](#) - [Similar](#) - [Feedback](#) [Print](#) [Close](#)

[What Is Lexapro? What is Lexapro For?](#)

Learn what **Lexapro** is and information on **Lexapro** as a treatment for depression and generalized anxiety disorder.

www.lexapro.com/about_lexapro/what_is.aspx - [Cached](#) - [Similar](#) - [Feedback](#) [Print](#) [Close](#)

[Lexapro \(Escitalopram Oxalate\) Drug Information: Uses, Side ...](#)

Apr 16, 2009 ... Learn about the prescription medication **Lexapro** (Escitalopram) including its uses, dosage, side effects, drug interactions, warnings, ...

www.rxlist.com/lexapro-drug.htm - [Cached](#) - [Similar](#) - [Feedback](#) [Print](#) [Close](#)

[Lexapro Information from Drugs.com](#)

May 14, 2009 ... **Lexapro** (escitalopram) is used to treat anxiety and major depression. Includes **Lexapro** side effects, interactions and indications.

www.drugs.com/lexapro.html - [Cached](#) - [Similar](#) - [Feedback](#) [Print](#) [Close](#)

[Escitalopram - Wikipedia, the free encyclopedia](#)

Escitalopram (trade names **Lexapro**, Cipralex) is an antidepressant of the selective serotonin reuptake inhibitor (SSRI) class. It is approved by the U.S. ...

en.wikipedia.org/wiki/Escitalopram - [Cached](#) - [Similar](#) - [Feedback](#) [Print](#) [Close](#)

[Lexapro Oral : Uses, Side Effects, Interactions, Pictures ...](#)

Find patient medical information for **Lexapro** Oral on WebMD including its uses, side effects, safety, interactions, pictures, warnings and user ratings.

www.webmd.com/.../drug-63990-Lexapro+Oral.aspx?...Lexapro... - [Feedback](#) [Print](#) [Close](#)

Unbranded ad leads to a branded site (bait-and-switch)

Canadian pharmacies, online pharmacies, holistic and other unregulated entities now own the ad space

[Red Link](#)

Sponsored Links

[lexapro 20mg 90 \\$41](#)

Plus Drugstore Rewards 5% Off

Buy Cheap Drugs, Call 1-877-223-9977

BigMountainDrugs.com/Lexapro

[100 Tabs for \\$24.99](#)

Price Beat Guarantee. Money Back

Guarantee. CIPA Certified. Save now

www.NorthWestPharmacy.com/Lexapro

[Lexapro Coupon](#)

Savings from Lexapro Coupon Codes

Easy to Use by Email, Fax or Phone

www.OnlinePharmacyCoupons.com

[Lexapro Escitalopram](#)

Generic: 20mg 90 Tabs \$88.00

We Beat All Competitors' Price

CanadaDrugCenter.com/Lexapro

[Compare. 20mg 90 For \\$42.](#)

Premium Canadian Pharmacy.

Free Shipping & Low Price Guarantee

PlanetDrugsDirect.com/Lexapro

[Save on Escitalopram 20mg](#)

Generic \$45.97 100 Tabs

Brand \$164.97 100 Tabs

www.CheapoDrugs.com/Lexapro

[See your ad here >](#)

Conservative Interpretation



Conservative Interpretation Affects Consumers Negatively: Web sites

Product Received Warning Letter for Non-Internet Advertising



Prior to Warning Letter



Post-Warning Letter

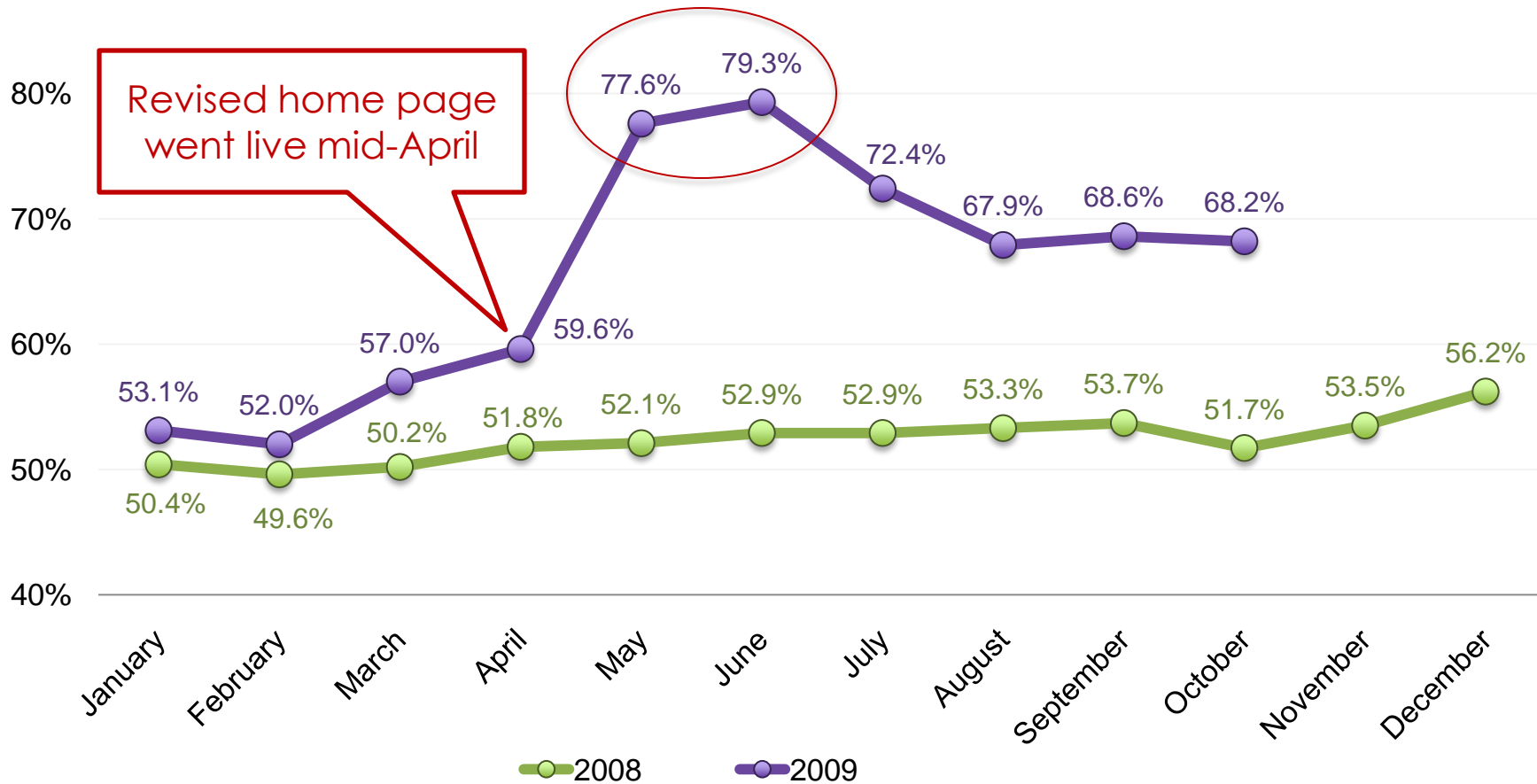
Product.com: Reactions to Revised Safety Info

My hubby said **who the heck** would go through all that?? I agree...I'm hoping those are the **really rare side effects they legally have to disclose.**

I know they have to be upfront about what "may" happen but my goodness – that was a **very long and terrifying list** wasn't it?

It reads like a what's what of scary side effects. I'm in my 50s now, and don't have arthritis, but if I did, I think this disclaimer doctrine would **scare the crap out of me.**

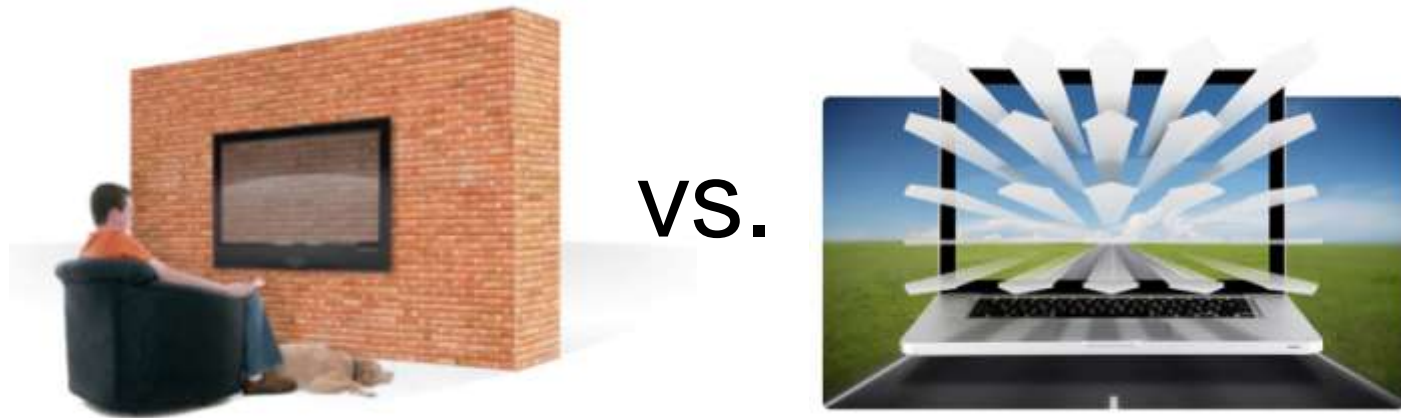
Product.com Home Pg Bounce Rates



- New home page launched April 15th
- Bounce rates spiked in May of 2009, increasing by nearly 20%
- Average industry bounce rates range from 35-55%

TV as Unique Medium

- > In 1999, FDA issued guidance for industry on use of TV as a separate medium, as an exception¹.
- > By issuing this provision, FDA recognized TV's importance and influence.



There are no guidelines specific to the Internet. Yet.

Opportunities

connected

interactive



infinite

The Internet

Opportunity to inform, connect

linkable

dynamic

deep

engaging

Opportunities

- How can pharmaceutical co's ...
- > provide product information to consumers ...
 - > when and where they are seeking that information online ...
 - > in a responsible and balanced manner ...
 - > when there can be space limitations in this medium?



Solutions

- > We need **one consistent way to show** product indication & risk information across Internet, social media channels.
- > Flag to consumers that:
 - > There is a specific indication/s associated with this medication
 - > There are RISKS associated with taking this medication
 - > The information is there for every consumer to learn more about those RISKS



The RxRISK Internet Provision

Components:

1. RxRISK Visual icon

- > In mediums that support it

2. RxRISK standardized link

- > For limited-space mediums that disallow graphics

3. RxRISK Educational campaign

- > So consumers understand it



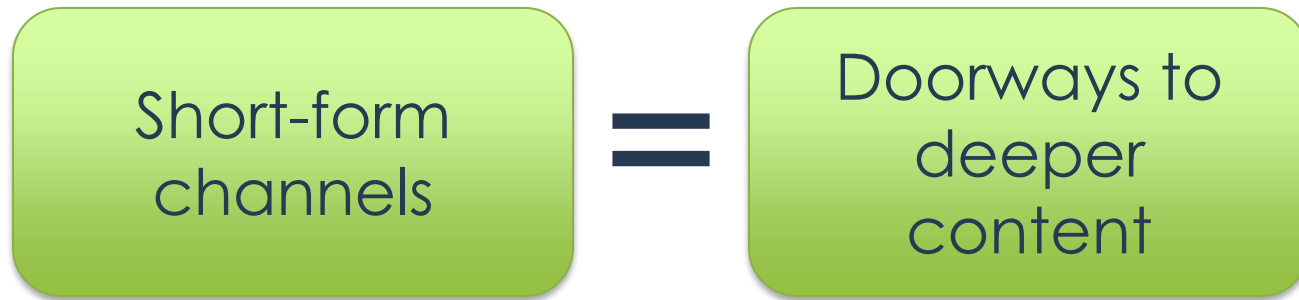
RxRISK: Web Sites

The screenshot displays the RxRISK website layout. At the top left is a 'LOGO' placeholder. At the top right is the 'RxRISKS' logo and a search bar with the text 'Enter Search'. Below the header is a navigation bar with links: 'Important Safety Information | Medication Guide | Healthcare Professionals | Contact Us'. On the right side of the navigation bar are links for '+ Text Size' and '| Print This Page'.

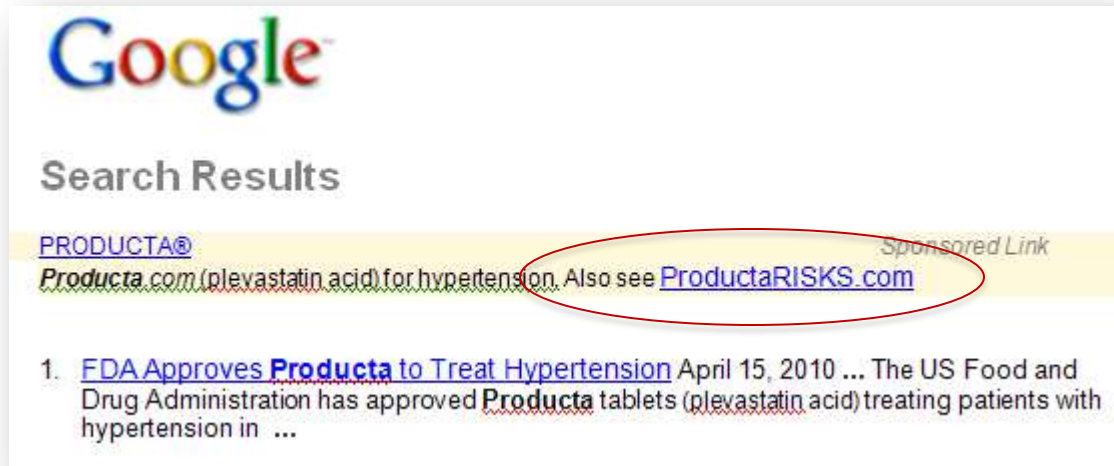
The main content area is divided into several sections:

- Left Sidebar:** A vertical list of navigation links including Home, About Condition, About Product, Symptom Assessment, Patient Stories, Tools & Resources, FAQ's, Financial Help, Register for Information Caregivers & Parents, Currently on Product, Full Prescribing Info, and Medication Guide.
- Central Content Area:** A large grey box with the headline 'Disease is a condition that gets worse over time.' and subtext 'Learn how condition progresses – and how product can help.' To the right of this text is a video player placeholder titled 'Watch Patient Stories' with the label 'PATIENT VIDEO'.
- Right Sidebar:** A section titled 'SAFETY INFORMATION' containing a block of placeholder text.
- Bottom Section:** A grid of six grey boxes, each with a title and a link: 'Symptoms of Disease' (CLICK THRU SLIDESHOW), 'How Condition Affects Your Body' (DISEASE MOA VIDEO), 'How Product Works' (MOA VIDEO), 'Long-term effects of Condition' (3-D ANIMATED CHART), 'Treatment Assessment' (INTERACTIVE POLL), and 'Payment Assistance' (TEXT).
- Footer:** A paragraph of placeholder text starting with 'Important Safety Information lorem ipsum dolor sit amet...'.

RxRISK in Limited Space



RxRISK: Search Advertising

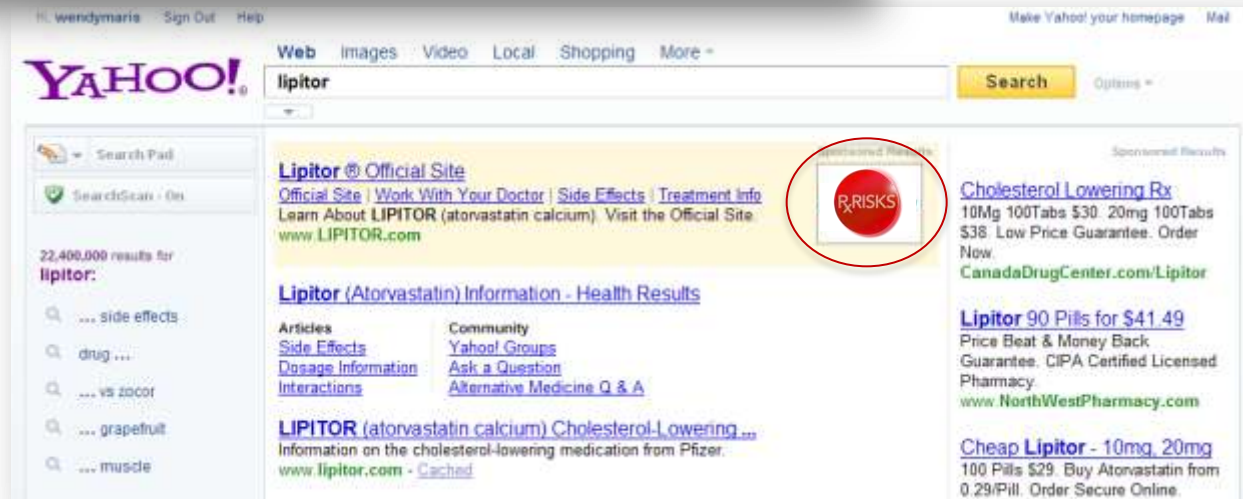


Google

Search Results

[PRODUCTA®](#)
Producta.com (plevastatin acid) for hypertension. Also see [ProductaRISKS.com](#) Sponsored Link

1. [FDA Approves Producta to Treat Hypertension](#) April 15, 2010 ... The US Food and Drug Administration has approved **Producta** tablets (plevastatin acid) treating patients with hypertension in ...



wendymaris Sign Out Help

Make Yahoo! your homepage Mail

Web Images Video Local Shopping More

lipitor Search Options

Search Pad
SearchScout - On

22,400,000 results for lipitor:

- ... side effects
- ... drug ...
- ... vs zocor
- ... grapefruit
- ... muscle

Lipitor® Official Site
Official Site | Work With Your Doctor | Side Effects | Treatment Info
Learn About LIPITOR (atorvastatin calcium). Visit the Official Site
[www.LIPITOR.com](#)

Lipitor (Atorvastatin) Information - Health Results

Articles: [Side Effects](#), [Dosage Information](#), [Interactions](#)

Community: [Yahoo! Groups](#), [Ask a Question](#), [Alternative Medicine Q & A](#)

LIPITOR (atorvastatin calcium) Cholesterol-Lowering ...
Information on the cholesterol-lowering medication from Pfizer.
[www.lipitor.com](#) - Cached

RISKS Sponsored Results

Cholesterol Lowering Rx
10Mg 100Tabs \$30. 20mg 100Tabs \$38. Low Price Guarantee. Order Now.
[CanadaDrugCenter.com/Lipitor](#)

Lipitor 90 Pills for \$41.49
Price Beat & Money Back Guarantee. CIPA Certified Licensed Pharmacy.
[www.NorthWestPharmacy.com](#)

Cheap Lipitor - 10mg, 20mg
100 Pills \$29. Buy Atorvastatin from 0.29/Pill. Order Secure Online.

RxRISK: Banner Advertising



NASONEX
(mometasone furoate monohydrate)
Nasal Spray, 50mcg*
*calculated on the anhydrous base.

SAVE UP TO \$15
on your next refill. Up to \$180 a year.[†]

[click here for instant savings coupon](#)

RxRISKS
[†]see eligibility, terms and conditions on coupon



ADVERTISEMENT

With my depression,
I feel like I have to keep
winding myself up
to deal with

TROUBLE SLEEPING



Pristiq[®]
desvenlafaxine
EXTENDED-RELEASE TABLETS

RxRISKS

Medication Guide &
Prescribing Information

ADVERTISEMENT

RxRISK: Mobile Communications



Remember to take your
Producta today at 5 p.m.
Read about risks at
ProductaRISKS.com



Why will RxRISK Work?

1. Elevates fact that **RISKS exist**
2. Reduces consumer **confusion**
3. Presents a **consistent**, standardized approach across products
4. Immediately **recognizable**
5. Leaves little room for **misinterpretation**
6. Has **longevity**
7. Can apply to current and **future** Internet uses, channels and even mobile technologies

Summary

1. The Internet and social media are **critical** to consumer's health information-seeking behavior.
 - > There are **no guidelines**, yet guidelines have been issued in past for special media
2. Consumers can be **misled** in the absence of pharma advertising
3. Consumers can be **confused** when pharma is forced to interpret (lack of) guidelines
4. A simple **solution** must exist that can work across platforms, now and in the future.

The logo for Intouch Solutions is located in the top left corner of the slide. It features a stylized graphic of a person with arms raised, composed of geometric shapes, above the text "INTOUCH SOLUTIONS" in a sans-serif font.

Questions?

Thank you