

PFIZER DTC HEARING ABSTRACT

Advancing Public Health Through Effective—Accessible, Understandable, and Relevant-- Consumer Health Communication

Too many Americans who need medical help still don't receive it. This leads to unnecessary suffering and high-cost, acute-care medical interventions. Accessible and motivating (i.e. understandable and relevant) health information is essential for the public to become more engaged in their health care and to manage health care decisions as active partners with healthcare providers. At the Hearing, Pfizer will review the strong empirical record proving the public health value of direct-to-consumer (DTC) advertising of prescription medicines. We will discuss techniques, challenges, and opportunities in crafting appropriate DTC communications.

Benefit and Risk Information in DTC Communications

Research shows that DTC advertising encourages people to seek out additional health information. This reinforces the proposition that DTC communications should be designed as a catalyst for the public to seek out more in-depth information, including active dialogue with their health care providers about the benefits and the risks of a prescription medicine. It argues for the notion that DTC ads – especially television ads – should be viewed as a vehicle for providing the most important information about benefits and risks. An individual DTC advertisement should not be viewed as a single comprehensive source of all possible benefit and risk information. There are other complementary vehicles that allow for more detail. Our experience shows that patients must overcome significant barriers in order to seek out medical help and to engage in healthy behaviors, such as appropriate evaluation and treatment of medical conditions. It is critical, then, to strike the right balance in the communication of benefit and risk information in DTC ads so that we neither underwarn nor overdeter the public. FDA must be mindful that, in its current form, DTC advertising has been effective in providing relevant information that: 1) raises awareness of medical conditions and treatment options; 2) encourages the public to talk to their healthcare providers; and 3) helps millions of people get diagnosed early, and appropriately treated for medical conditions.

Improving DTC Communication to Meet the Public's Health Information Needs Better

The pharmaceutical industry is improving DTC advertising in several areas, including benefit and risk communication, to better meet the public's needs. The recent adoption of the PhRMA Guiding Principles for DTC Advertising will help the public benefit further from accurate and timely information that encourages discussion of medical conditions and treatment options with healthcare providers.

In addition, Pfizer itself recently announced a series of changes to its DTC advertising practices that aim to improve the communication of benefit and risk information, encourage a better patient-physician dialogue, and motivate people to overcome the substantial barriers to better health. These changes are based on research and ongoing dialogue with consumers, healthcare providers, and other key stakeholders. We believe that, as a result, millions of Americans will benefit even more from accessible and motivating health information that encourages them to visit their doctor and uncover health conditions earlier and then appropriately address them.

More Empiric Evidence Is Needed To Understand Better How Consumers Process Health Information

As new questions continue to be raised about information in DTC advertising, Pfizer intends to pursue additional empirical research to fill in the data gaps and thereby help inform empirically-based policy in this area. At the Hearing, we will address the need for research that is focused on better understanding how consumers process information in DTC advertising and how this implicates the presentation of benefit and risk information. In addition, we will outline key questions that aim to help define and measure how important health information can be more effectively imparted and received through mass communications.

Earlier this year, Pfizer committed to conduct research about the public's understanding of benefit and risk information in DTC television advertising, similar to the comprehensive research we conducted on the brief summary in DTC print ads. This research can help guide establishment of reasonable and achievable goals and guidance for benefit and risk communication in DTC advertising. We solicit participation in this research from FDA and other interested stakeholders.