

**Word of Mouth Marketing Association (WOMMA)**

# Finding Best Practices for Social Media *Health Marketing*



## A Mission Based Upon Ethics & Best Practices

We believe that protecting consumers is paramount in maintaining the trust between marketer and consumer in social media marketing.

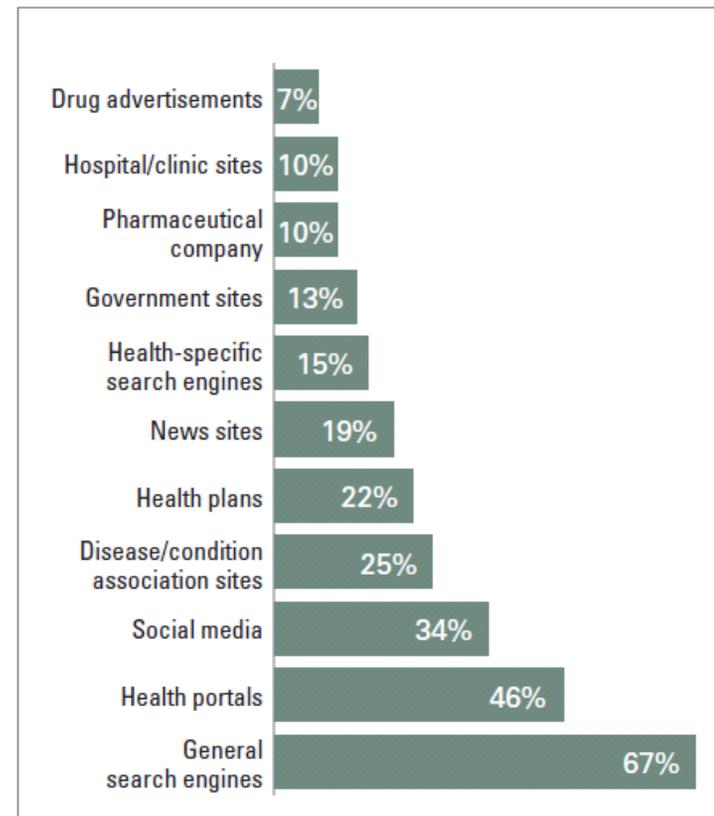
The Word of Mouth Marketing Association (WOMMA) is the “best practices” community where practical knowledge and ethics are developed and shared.



## Assumptions

1. Consumers increasingly include social media (“people like me”) as one of the top four sources for health information online.
2. Brands are increasingly reaching consumers via new influencers and the social Web.
3. Consumers expect to interact with brands in social media. And they expect open and transparent behaviors from those brands.

**Figure 2. Online Tools and Resources Used to Locate Health Information**





## Fundamental Questions

- How can health products marketers support “fair balance” in their own social media marketing practices amidst a flood of third-party, uncontrollable content?
  - Can marketers help get correct information out to consumers via social media?
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## Answers

1. WOMMA's experience **defining and championing ethics** may offer a model for doing the same in health products marketing
  2. By establishing a set of **clear guardrails**, the FDA can drive marketers to innovate and add detailed practical application of best-practice marketing
  3. We need to **adopt a new vocabulary** beyond "labeling" and advertising to keep pace with change
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## WOMMA's Ethical Foundation

- Engaging in practices and policies that promote an environment of trust between the consumer and marketer\*
- Open and transparent marketing practices based upon the Honesty ROI\*\*
  - Relationship: both marketers and influencer completely and clearly disclose any material connection between them
  - Opinion: that the statements in a WOM mention are the opinion of the author
  - Identity: you always represent who you are clearly and completely



\*See WOMMA Ethics Code: <http://womma.org/ethics/code/>

\*\*See WOMMA Ethics FAQs: <http://womma.org/ethics/faqs/>

## WOMMA's Ethical Foundation

- Our Ethics Code was cited (positively) 18 times in the recent FTC Guidelines for Endorsement and Testimonials.
- Our 300 members adopt our code of ethics and specific conditions for membership, including:
  - Cooperate with and abide by WOMMA's self-regulatory efforts, its complaint resolution programs, and other association rules
  - Promptly respond to all complaints forwarded by WOMMA or from any official complaint resolution program, make a good faith and reasonable effort to resolve all such complaints in accordance with generally accepted and proper business practices...



\*See WOMMA Ethics Code: <http://womma.org/ethics/code/>

## Best-Practice Word of Mouth Marketing “Guardrails”

Q: When is third-party communication via social media subject to substantive influence by companies that market products related to the communication or discussion?

A: The FTC Guidelines try to distinguish between what should be considered an endorsement or a sponsored message. It’s defined by a few hard-to-pin-down qualities.

Don’t split hairs. Treat every social media program the same. Require full disclosure of the details of any material connection between the blogger and the marketer or brand. Whether you employ a community manager, pay expenses to visit brand headquarters, or buy snacks at a Tweetup - disclose, disclose, disclose.

## Best-Practice Word of Mouth Marketing “Guardrails”

Q: What can be done when third parties don't get the facts straight or only pass along a portion of the information?

A: We need to try and make sure that any online influencers who we proactively connect with share their own experience and don't make any false claims, intentionally or not. We value those relationships and the trust they build with their followers. We want everyone to get the best information possible. We listen to what our influencer/bloggers say online. If they should make a claim that isn't correct, we will respectfully engage with them to correct the point or stop outreach to them.

Conversely, no brand can police the Web for inaccurate statements about their product.



## Best-Practice Word of Mouth Marketing “Guardrails”

Q: What does clear and complete “disclosure” look like?

A: This is a work-in-progress that WOMMA is currently focused on. We are hosting a conversation of members and involving the FTC to define exact practices. Here are **some of those innovations:**

- Post a “terms of engagement” on your own brand site where people can easily find it, ask your bloggers to link to it and publish their own description of these terms
- Use social media monitoring tools to verify accuracy of information amongst influencers we engage directly with
- In a world of 140 characters (Twitter) and Facebook news feeds, it’s not always clear how disclosure should be handled. New systems like “cmp.ly” may hold the answer

# Innovative Solutions

The screenshot displays the CMP.LY website interface. At the top right, there are navigation links for HOME, ABOUT, and CONTACT US. The main header features the CMP.LY logo and a tagline: "cmp.ly (kem-ple) To act in accordance with another's command, request, rule, or wish". Below the header, a paragraph explains that CMP.LY provides a simple and easy method for disclosing material connections. A section titled "Choose a disclosure:" lists six options, each in a yellow box with a numbered header and a "Read More" link:

- 0** **CMP.LY Disclosure 0**  
*No connection, unpaid, my own opinions*  
[Read More](#)
- 1** **CMP.LY Disclosure 1**  
*Based upon a review copy*  
[Read More](#)
- 2** **CMP.LY Disclosure 2**  
*Given a sample by vendor/agency/brand*  
[Read More](#)
- 3** **CMP.LY Disclosure 3**  
*Paid post – cash payment or other compensation*  
[Read More](#)
- 4** **CMP.LY Disclosure 4**  
*Employee/shareholder/business relationship*  
[Read More](#)
- 5** **CMP.LY Disclosure 5**  
*Custom Disclosure*  
Coming Soon

At the bottom of the browser window, the address bar shows "Internet" and "100%". A watermark for "word of mouth marketing association" is visible in the bottom right corner of the browser window.

cmp.ly is an example of a entrepreneurial effort to create a standard disclosure system that makes it clear for consumers and easy for marketers to be transparent about "material connection" between brand and influencer

# A New Vocabulary Beyond “Labeling” and “Advertising” ...

## Owned

- Labeling
- Web sites
- Brand’s Social Web

## Paid

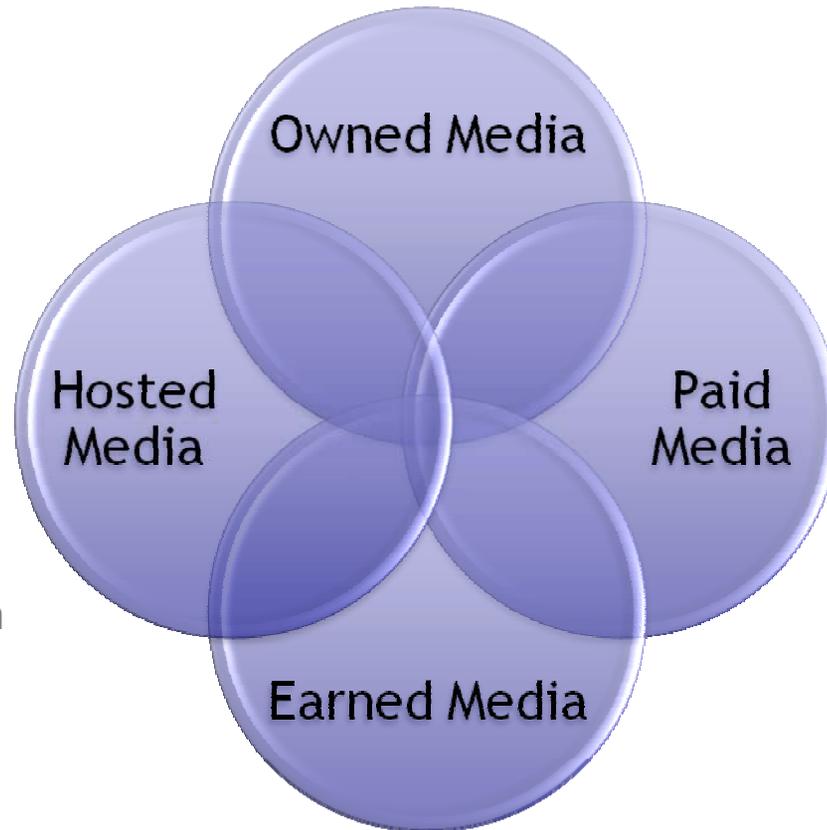
- Advertising

## Earned

- Online Word of Mouth
- Offline Word of Mouth
- Media Relations

## Hosted

- Communities



# Owned – Clear Disclosure

The image shows a screenshot of the AstraZenecaUS Twitter profile page. Two red circles highlight the profile name and the bio. The profile name is "AstraZenecaUS" and the bio is "Bio US business for AstraZeneca, a global biopharmaceutical company". The page also shows the profile picture, a "Following" button, and a list of tweets. The browser's address bar shows "Internet" and "100%" zoom.

twitter

Home Profile Find People Settings Help Sign out

 **AstraZenecaUS**

Following

Name AstraZenecaUS  
Location Wilmington, DE  
Web <http://astrazenec...>  
Bio US business for AstraZeneca, a global biopharmaceutical company

321 following 2,004 followers 28 listed

Tweets 254

Favorites

Actions  
block AstraZenecaUS  
report for spam

Following

Visit The #Bipolar Journey Exhibit  
10/31 #NAMIC CT State Conference  
New Haven, CT  
[www.TalkAboutBipolar.com](http://www.TalkAboutBipolar.com)  
11:18 AM Oct 30th from web

@nliang Atherosclerosis (athero) is a cause of cardiovascular disease, the #1 cause of death globally. Learn more at [athero.com](http://athero.com)  
2:02 PM Oct 29th from web

RT @medibiologics #MediBio MedImmune hosting "Future of Medicine: Small Molecules or Biologics?" forum 10/30 Mandarin Oriental DC 10a-1pm  
9:22 AM Oct 29th from web

Just announced our third quarter performance: [\\$AZN](http://bit.ly/JnxRx)  
7:03 AM Oct 29th from web

AZ and Mercy Primary Care Center provide #Rx assistance to #Detroit patients--<http://bit.ly/1wwbmB>  
1:36 PM Oct 27th from web

Ever wonder how a new #medicine is discovered? Helpful video on #pharma research: <http://bit.ly/4oVpU5>  
12:11 PM Oct 27th from web

RSS feed of AstraZenecaUS's tweets

Done Internet 100%

# Owned – Clear Disclosure

The screenshot displays the Facebook page for ADHD Allies. The page header includes the Facebook logo, navigation links (Home, Profile, Friends, Inbox 310), user information (John Bell, Settings, Logout), and a search bar. The main content area features the ADHD Allies logo and a 'Become a Fan' button. Below the logo is a 'Fans' section with 6 of 13,217 fans listed, including Wendy Palmer, Nikka Kovalsky, Shannon Clarke, Adam Rennie, Shelly Lowry Steffey, and Beya. A 'Sponsored By' section is highlighted with a red circle, featuring the McNeil Pediatrics logo and the text: 'McNEIL PEDIATRICS. DIVISION OF ORTHO-McNEIL-JANSSEN PHARMACEUTICALS, INC. http://www.mcneilpediatrics.net'. Below this is an 'Announcements' section with a logo for 'ADHD MOMS A PLACE FOR MOMS OF CHILDREN WITH ADHD'. The main feed contains several posts from ADHD Allies, including a post about a poll on the Boxes tab, a post about a new poll on the Boxes tab, a post about a book by Ari Tuckman, a post about a poll on the Boxes tab, a post about a conference by CHADD, and a post about a poll on the Boxes tab. The right sidebar includes a 'Create an Ad' section, a 'Connect With More Friends' section with a Facebook logo and an envelope icon, and a 'More Ads' section. The bottom of the page shows a Windows taskbar with various application icons, a chat window for 32 people, and a system tray with the Internet icon and a 100% zoom level.

# Hosted – Clear Disclosure

The screenshot displays the CMLearth website interface. At the top right, there are links for "Login | Choose Language | About | Help". The main header features the "CMLearth" logo with the tagline "SHARE. SUPPORT. CONNECT." and the "NOVARTIS ONCOLOGY" logo. Below the header is a world map with various colored markers representing users. A legend in the bottom left identifies the markers: orange for "CML Patient", green for "CML Patient Group", and blue for "CML Professional". The map includes navigation controls for "Satellite", "Map", and "Hybrid" views. At the bottom, there are buttons for "Join the Community", "Send to a friend", "Find a patient group", and "Search". A "FEATURED PROFILES" section shows three profile cards with durations of "1 years", "2 years", and "2 years". A "SPOTLIGHT" section features a logo for "Stichting Contactgroep Leukemie". A footer at the bottom states: "Use of this website is subject to our [Terms of Use](#). © 2009 Novartis AG | [Privacy Policy](#) | [Unsubscribe](#)".

# Earned – Clear Disclosure

With a variety of tastes and textures, Chex mix is **A BAG OF INTERESTING™**  **Save 55¢ Now** Print Coupon

Home About Us In the Limelight Giveaways Friends Contact Us  **GO**

## from Dates to Diapers™ AND BEYOND!

### WHY WE DON'T DO HALLOWEEN

 October 31, 2009 by Christine  51 Comments  
Filed under [Holidays](#)

This time of year it's impossible to avoid ghosts, goblins, jack-o-lanterns, and witches, except around here. If you've noticed, the most I've talked about Halloween, here at From Dates to Diapers, was **last August** when I discussed my kiddos love for costumes, even though we do not participate in Halloween-related activities.

I know what you're thinking, *What?! You don't dress up for Halloween?*, right? Well, the answer is very simple – No, we don't do Halloween.

Let me just say that not once, in my entire life, have I dressed up to go trick-or-treating, and never did I feel like I was being deprived. My parents were very clear and open about why they had made the decision not to participate, and I accepted their explanation and honored their decision. After all, it made sense.

It still makes sense, almost 30 years later, but now I understand the depth of those reasons.

*Before I go any further, let me say that I know this is a very controversial subject, even among Christians. I will not, and do not, judge those who have made the decision to participate in the festivities of this day, for I believe we have been given freedom in Christ. All I ask is that you please provide me and my family the*

### ENEWS & UPDATES

 Sign up to receive breaking news as well as receive other site updates

**GO**



### ABOUT CHRISTINE

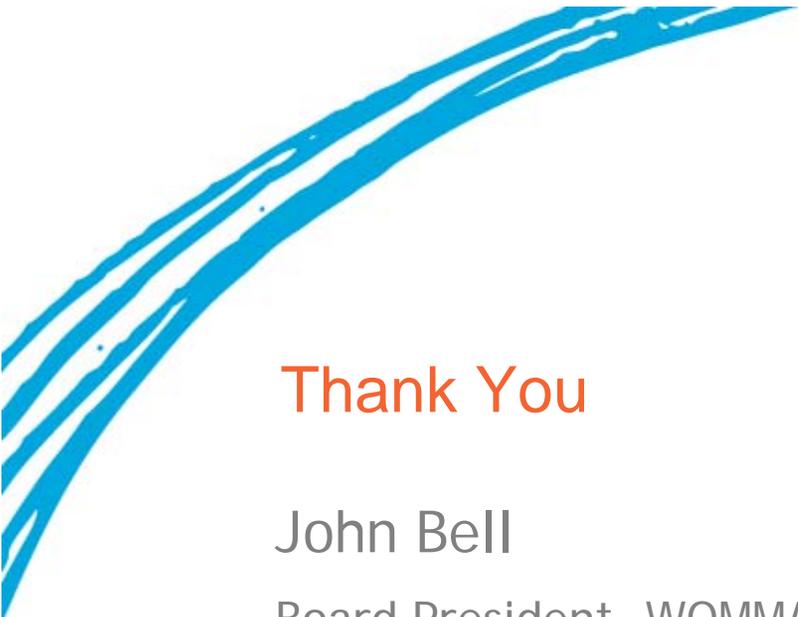






## Answers

1. WOMMA's experience **defining and championing ethics** may offer a model for doing the same in health products marketing
  2. By establishing a set of **clear guardrails**, the FDA can drive marketers to innovate and add detailed practical application of best-practice marketing
  3. We need to **adopt a new vocabulary** beyond "labeling" and advertising to keep pace with change
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## Thank You

John Bell

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Melissa Davies

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## Background Material

- WOMMA Ethics Code
- Additional References
- Consumer Behavior & Background

# Code of Ethics

## *Preamble*

The Word of Mouth Marketing Association (“WOMMA”) is an official trade association that represents the interests of the word of mouth and social media industry. WOMMA is committed to building a prosperous industry that is based upon best practices, effective standards, and responsible leadership. A central mission of WOMMA is to create an environment of trust between consumers and marketers. Members of WOMMA seek to enhance the meaningful development of their fellow members, the industry, and their customers, and are committed to compliance with laws and regulations that govern the prevention of unfair, deceptive or misleading marketing practices.



## Code of Ethics

Therefore, members of WOMMA strive to:

- Maintain the highest standards of business conduct, by using only legal and ethical means in their business activity;
- Observe all applicable laws, regulations, and rules pertaining to their marketing practices;
  - Actively promote and encourage the highest level of integrity within the industry;
- Cooperate in every reasonable and proper way with other members and work with them in the advancement of the industry;
- Lead by example and adhere to ethical standards that even may exceed those required by law; and
  - Commit to the development and use of the most effective standards and practices to promote consumer protection.



## Code of Ethics

*As a result, members of WOMMA share in the following core values:*

*Trust:* WOMMA members are committed to engaging in practices and policies that promote an environment of trust between the consumer and marketer.

*Integrity:* WOMMA members pledge to comply with the requirements of applicable laws, regulations, and rules concerning the prevention of unfair, deceptive or misleading advertising and marketing practices. In particular, WOMMA members promote honesty and transparency in their practices and methods, such that all forms of consumer manipulation are rejected. Indeed, advertising is a creative enterprise that strives to convince the consumer that the advertiser's product or service is necessary and valuable, but in the course of engaging with the consumers, WOMMA members are committed to avoiding consumer deception as an end result of their marketing practices. As a result, WOMMA members engage in practices that are designed to enable the reasonable consumer acting rationally to make better informed purchasing decisions.



## Code of Ethics

*Respect:* WOMMA members promote and abide by practices that focus on consumer welfare. WOMMA members believe that the industry is best served by recognizing that the consumer, not the marketer, is fundamentally in charge and control, and that it is the consumer that defines the terms of the consumer-marketer relationship.

*Honesty:* WOMMA members believe that consumers should be free to form their own opinions and share them in their own words. Simply put, WOMMA members do not support any efforts that tell others what to say or how to say it.

*Responsibility:* WOMMA members believe that working with minors in marketing programs requires sensitivity and care, given their particular vulnerability to manipulation and deception.

*Privacy:* WOMMA members respect the privacy of consumers, and encourages practices that promote the most effective means to promote privacy, such as opt-in and permission standards.



# Code of Ethics

## Conditions for Membership into WOMMA

*To qualify for and maintain a membership in WOMMA, the applicant or Member shall:*

- Share in the core values as set forth in the Code of Ethics and strictly abide by the “Standards of Conduct Required of WOMMA Members;”
- Supply accurate and complete information on the nature of the applicant or Member’s business and background, including information concerning the company’s principals and management personnel;
- Not having been convicted of a crime involving moral turpitude or fraud by a court of competent jurisdiction;



# Code of Ethics

## Conditions for Membership into WOMMA cont'd

*To qualify for and maintain a membership in WOMMA, the applicant or Member shall:*

- Cooperate with and abide by WOMMA's self-regulatory efforts, its complaint resolution programs, and other association rules;
- Promptly respond to all complaints forwarded by WOMMA or from any official complaint resolution program, make a good faith and reasonable effort to resolve all such complaints in accordance with generally accepted and proper business practices, and to comply with the terms of any findings issued; and
- Meet its financial obligations, including, without limitation, financial obligations to WOMMA.



# Code of Ethics

## *Purpose of the Code of Ethics*

WOMMA has adopted a Code of Ethics and Standards of Conduct as a requirement of membership into the association, with the hope that the Code and Standards reflect an attempt by industry members to “do the right thing” by engaging in responsible self-regulatory efforts concerning their marketing practices. The fulcrum of the Code and Standards is the Guides Concerning Use of Endorsements and Testimonials in Advertising promulgated by the Federal Trade Commission. See 16 C.F.R. § § 255.0-255.5.

WOMMA, however, is obviously not an agent or representative of any governmental regulator or law enforcement agency, and its views are not intended to represent any formal or informal interpretations of any laws or regulations.



# Code of Ethics

## *Standards of Conduct Required of WOMMA Members*

*Standard 1 - Disclosure of identity:* A WOMMA member shall require their representatives<sup>1</sup> to make meaningful disclosures of their relationships or identities with consumers in relation to the marketing initiatives that could influence a consumer's purchasing decisions.

*Standard 2 - Disclosure of consideration or compensation received:* A WOMMA member shall require their representatives to disclose meaningfully and prominently all forms of consideration or compensation they received from the member, marketer or sponsor of the product or service. In other words, WOMMA members shall not engage in marketing practices where the marketer/sponsor or its representative provides goods, services, or compensation to the consumer (or communicator) as consideration for recommendations, reviews, or endorsements, unless full, meaningful, and prominent disclosure is provided.

*Standard 3 - Disclosure of relationship:* A WOMMA member shall require their representatives involved in a word of mouth initiative to disclose the material aspects of their commercial relationship with a marketer, including the specific type of any remuneration or consideration received.

*Standard 4 - Compliance with FTC Guides:* A WOMMA member shall comply with the Guides Concerning Use of Endorsements and Testimonials in Advertising promulgated by the Federal Trade Commission. See 16 C.F.R. §§ 255.0-255.5.



# Code of Ethics

## *Standards of Conduct Required of WOMMA Members*

*Standard 5* - Genuine honesty in communication: A WOMMA member shall not tell their representatives what to ultimately state in their communications about a particular product or service, so as to enable the consumer to reflect his or her honest opinions, findings, beliefs, or experiences.

*Standard 6* - Respect for venue: A WOMMA member shall respect the rights of any online or offline communications venue (such as a web site, blog, discussion forum, traditional media, and live setting) to create and enforce its own rules as it sees fit.

*Standard 7* - Marketing to children and adolescents: A WOMMA member shall not include children under the age of 13 in any of its word of mouth marketing programs or campaigns; and shall comply with all applicable laws dealing with minors and marketing, including the Children's Online Privacy Protection Act ("COPPA"). See 16 C.F.R. § 312.

*Standard 8* - Compliance with media-specific rules: A WOMMA member shall comply with existing media-specific rules regarding marketing to children.

<sup>1</sup> The term "representative" is intended to be construed broadly, so as, for example, to include vendors of marketing initiatives.



## Reference Material

WOMMA Ethics Code

<http://womma.org/ethics/code/>

iHealth Reports; "The Wisdom of Patients: Healthcare Meets Online Social Media - April 2008

<http://www.chcf.org/topics/chronicdisease/index.cfm?itemID=133631>

Pew Internet Project: The Social Life of Health Information - June 2009

<http://pewresearch.org/pubs/1248/americans-look-online-for-health-information>

Tom Ferguson MD: ePatients: How They Can help Us Heal Healthcare - 2007

[http://e-patients.net/e-Patients\\_White\\_Paper.pdf](http://e-patients.net/e-Patients_White_Paper.pdf)



## How We Find Information Online

“E-patients are using the internet to compare their options...to find the "just-in-time someone-like-me" who can aid their decision making.

- 41% of e-patients have read someone else's commentary or experience about health or medical issues on an online news group, website, or blog
- Fully 42% of all adults, or 60% of e-patients, say they or someone they know has been helped by following medical advice or health information found on the internet. This represents a significant increase since 2006 when 25% of all adults, or 31% of e-patients, said that.”



## How We Find Information Online

“This Pew Internet/California HealthCare survey finds that technology is not an end, but a means to accelerate the pace of discovery, widen social networks, and sharpen the questions someone might ask when they do get to talk to a health professional. Technology can help to enable the human connection in health care and the internet is turning up the information network’s volume.”



## The *Word of Mouth* “Train” Has Left The Station..

User generated media appears on the first three pages of Google results 88% of the time

(ePatients: How They Can help Us Heal Healthcare - 2007)



## Customers Expect Brands in Social Media

93% OF SOCIAL MEDIA USERS BELIEVE A COMPANY SHOULD HAVE A PRESENCE IN SOCIAL MEDIA

Cone Business in Social media study (September 2008)

85% BELIEVE A COMPANY SHOULD GO FURTHER & SHOULD ALSO INTERACT WITH ITS CUSTOMERS VIA SOCIAL MEDIA

Cone Business in Social media study (September 2008)





## Social Media Marketing “has left the station”

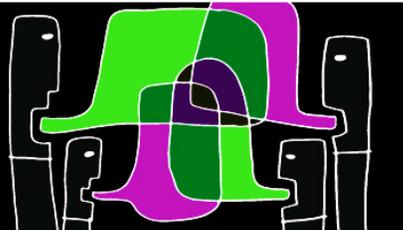
Total spending on WoM marketing is expected to increase 10.2% to \$1.70 billion in 2009 and grow at a CAGR of 14.5% during the 2008-2013 period, reaching \$3.04 billion as more brands include WoM in their media mix and ROI metrics improve\*



## Industry Effort to Define Marketing Best Practices

*Creating Talkable Brands:  
Beyond Social Media*

*4th Annual WOMMA Summit  
Nov. 18-20, 2009 Las Vegas, NV*



WOMMA is defining the practical best-practices for disclosure based upon the principles established by the FTC and our own Ethics Code. Our session at the annual summit is an example of that effort.

We need a similar industry effort for health products marketing to foster innovation in service to consumers

8:00am - 9:15am



### **KEYNOTE | The Role of the FTC in Word of Mouth and Social Media Marketing presented by Chuck Harwood, Assistant Deputy Director - Bureau of Consumer Protection**

This fall, the Federal Trade Commission (FTC) will release updated guidelines on endorsements used in advertising and marketing. These changes will impact the design and delivery of word of mouth marketing programs. WOMMA has been working in lockstep with the FTC on these anticipated changes. Mr. Harwood will provide the audience with his insight on their role and what you need to know for your business practices. Mr. Harwood will then join our distinguished panel of industry insiders for a roundtable discussion.

#### **Roundtable Discussion: Best Practices on Ethics, Endorsement, and Adequate Disclosure**

*Lee Peeler*, C. Lee Peeler, Esq., President and CEO of the National Advertising Review Council (NARC) and Executive Vice President, National Advertising Self-Regulation, Council of Better Business Bureaus (CBBB).

*Jory Des Jardin*, Co-Founder and President, Strategic Alliances at BlogHer

*Sean Corcoran*, Interactive Marketing Analyst at Forrester Research

*Anthony DiResta*, WOMMA's general counsel and partner at Manatt, Phelps & Phillips, LLP

*Paul Rand*, President & CEO at Zocalo Group

