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<http://blog.intouchsol.com>

[www.twitter.com/intouchsol](http://www.twitter.com/intouchsol)

<http://tiny.cc/IntouchsolFacebook>

[www.myspace.com/intouchsolutions](http://www.myspace.com/intouchsolutions)

# FDA

Internet &  
Social Media  
Hearing

# 2009

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

YouTube  
Broadcast Yourself™  
Home Videos Channels Shows  
Wendy@Intouch Sign Out  
Subscriptions History Upload

**FDA**  
U.S. Food and Drug Administration  
www.fda.gov

USFoodandDrugAdmin  
USFoodandDrugAdmin's Channel  
Subscribe Uploads

gel may contain  
**Bacillus subtilis and  
Bacillus circulans**

0:00 / 1:17  
Info Comments Favorite Share Playlists Flag

"Nuby" Gel-filled Teethers Recalled 3 ratings ★★☆☆☆

"Nuby" Gel-filled Teethers Recalled 75 views - 1 week ago  
Safety Warning on Certain Body-building Supplements (Anabolic Steroids) 55 views - 1 week ago  
Recall of Certain Hospira Devices 56 views - 1 week ago  
Alaris (Medley) Infusion Systems Recalled 79 views - 1 week ago  
Certain Lots of Teva Propofol Recalled 37 views - 1 week ago  
Potentially Fatal Errors with Certain Chinese Tablets

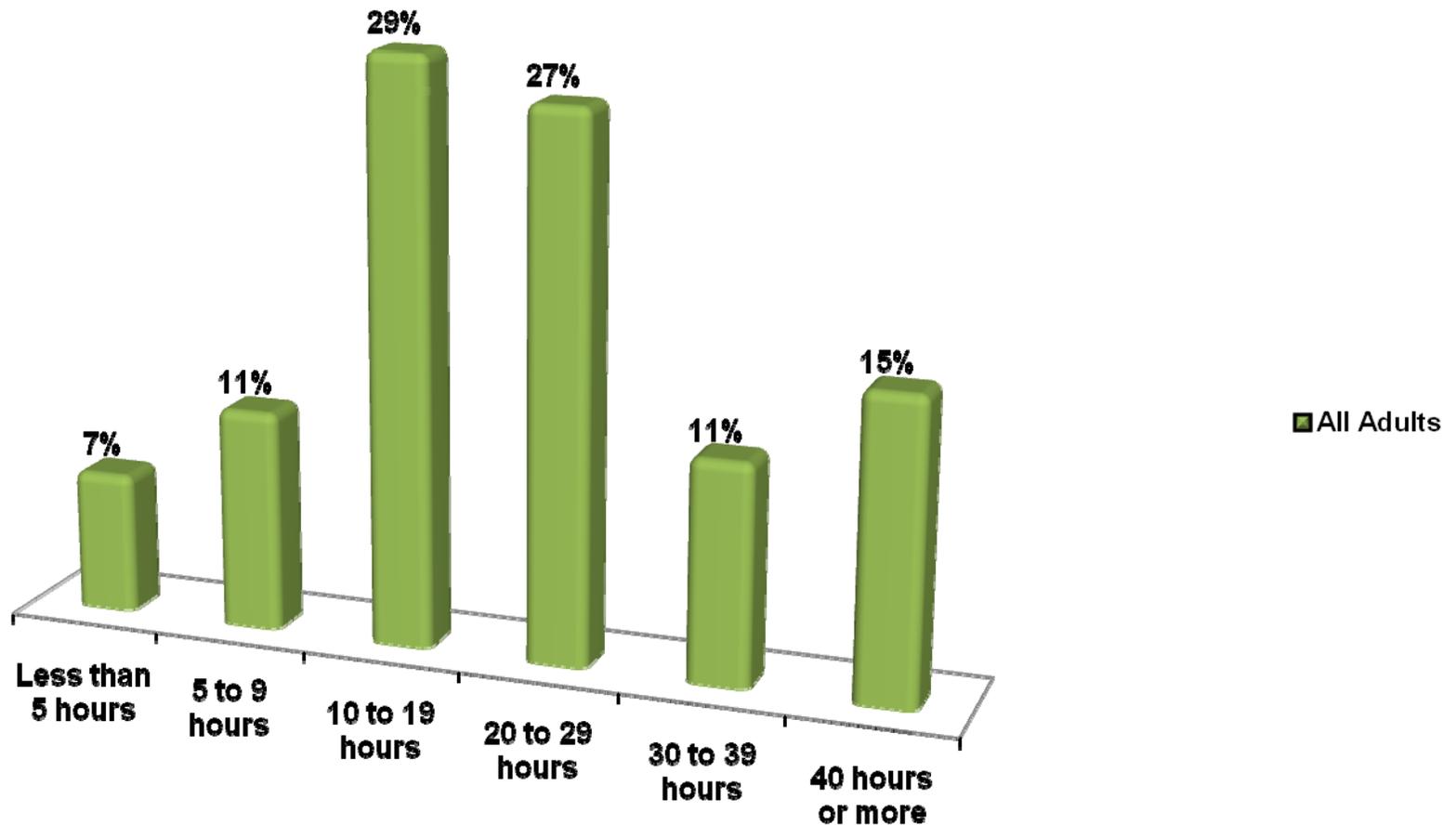
twitter  
FDA FDAcdRhIndustry

twitter  
FDA FDArecalls

twitter  
FDA FDA\_Drug\_Info

Obama stimulus package allocates  
\$20 billion to healthcare IT

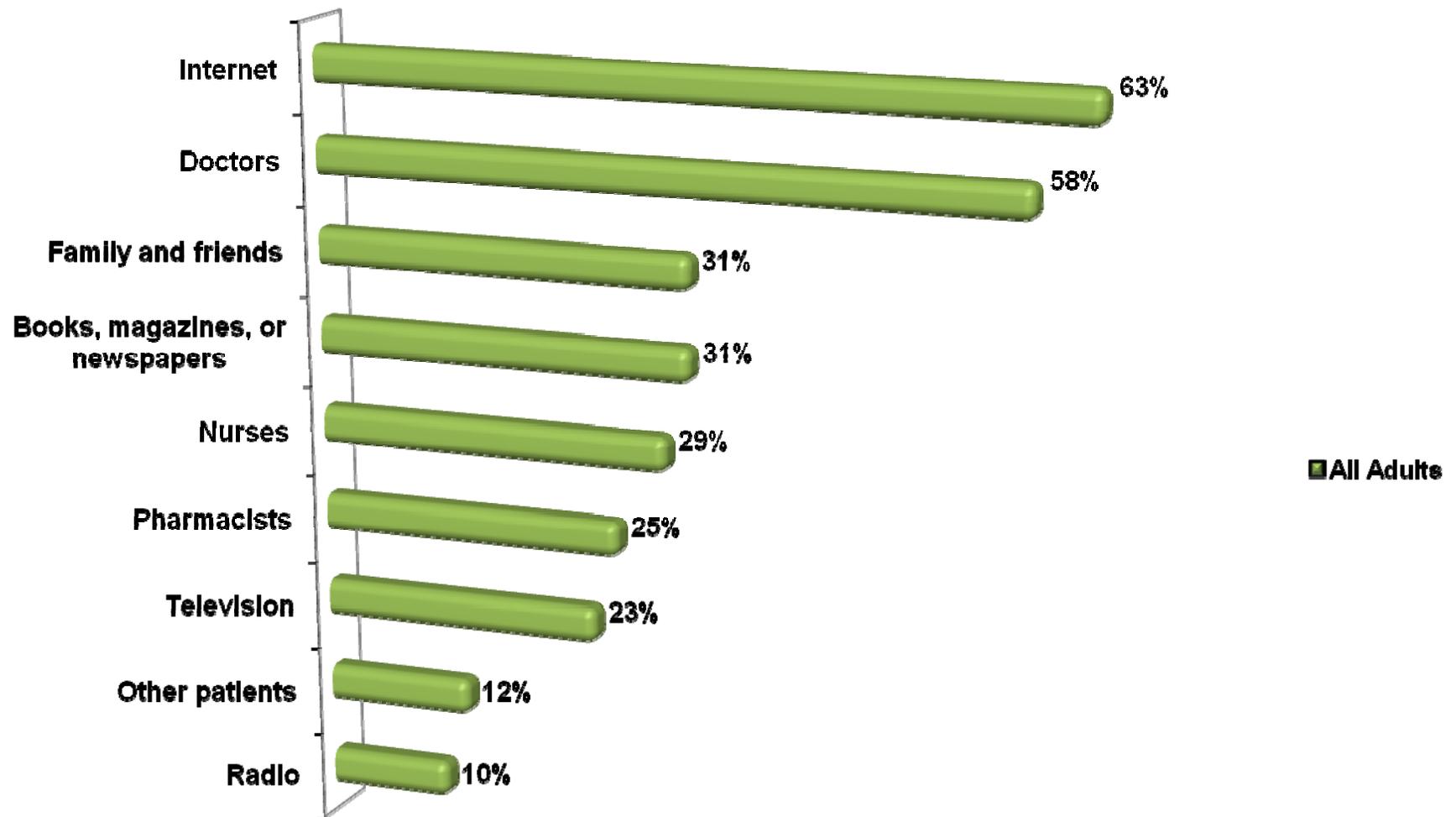
# Over 1/2 of Adults Spend > 20 hrs/week Online



Among those who are online

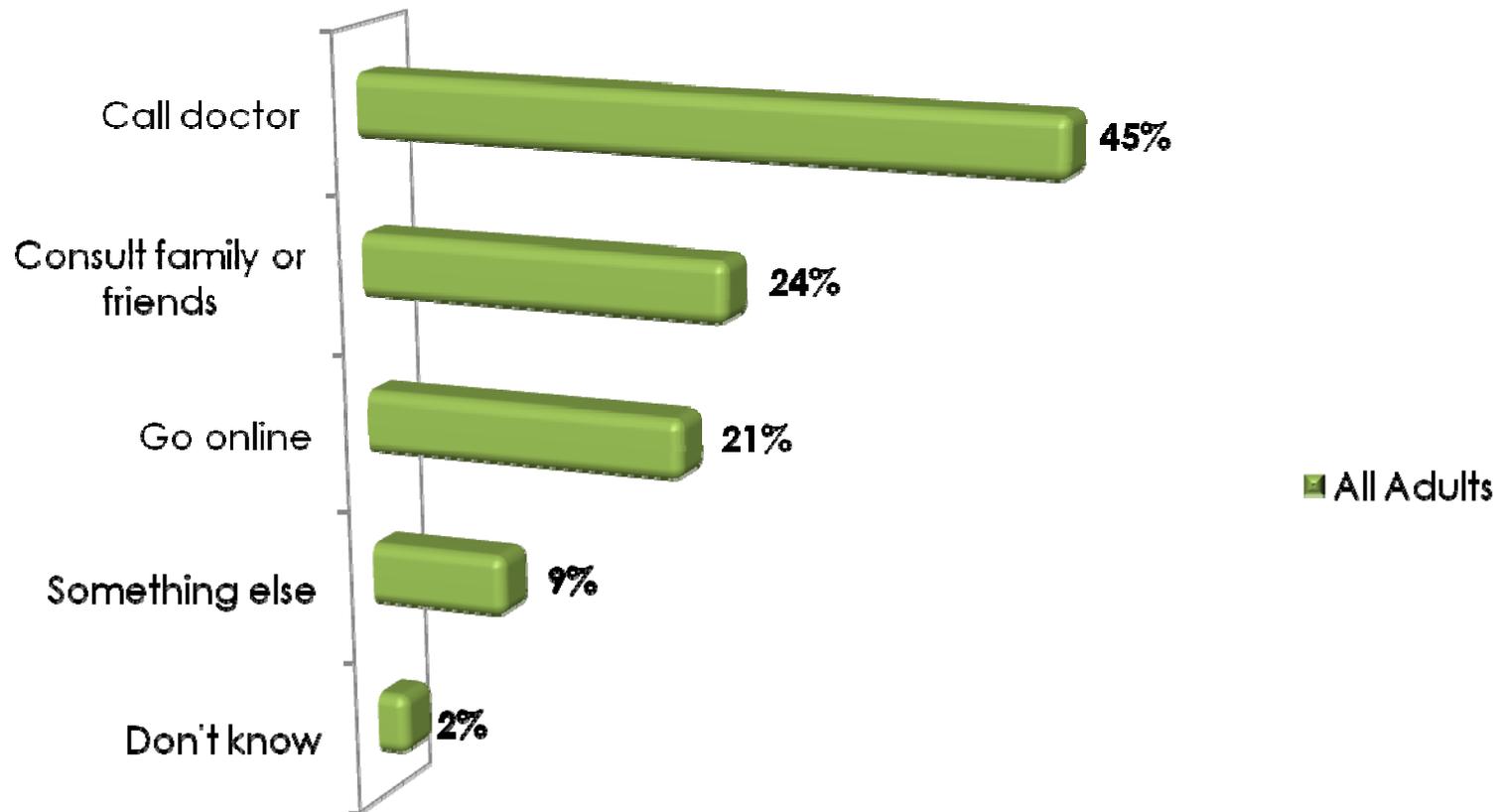
Source: Cybercitizen Health™ v8.0—Q3 2008

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



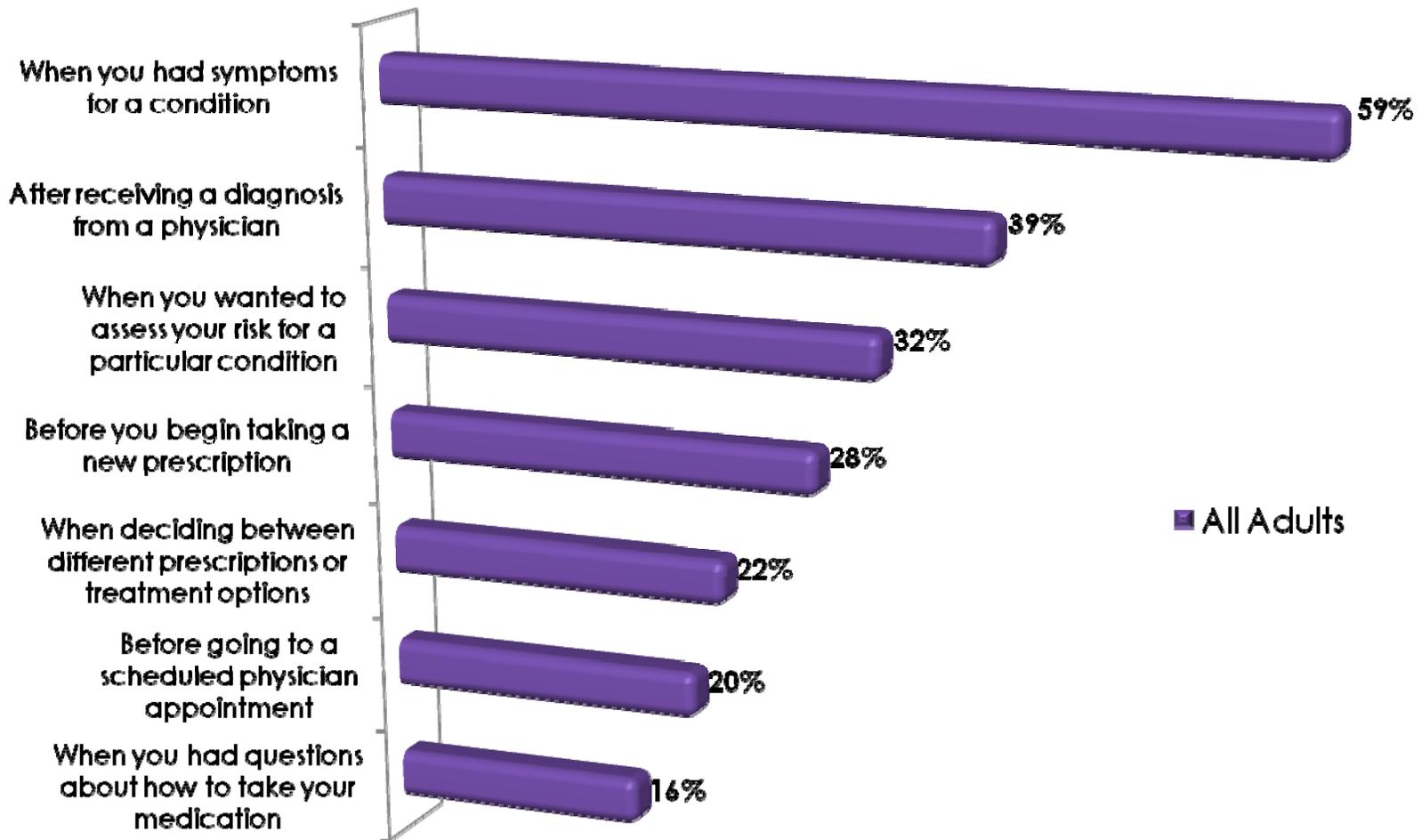
# Online Research Comparable to Family Consultation

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



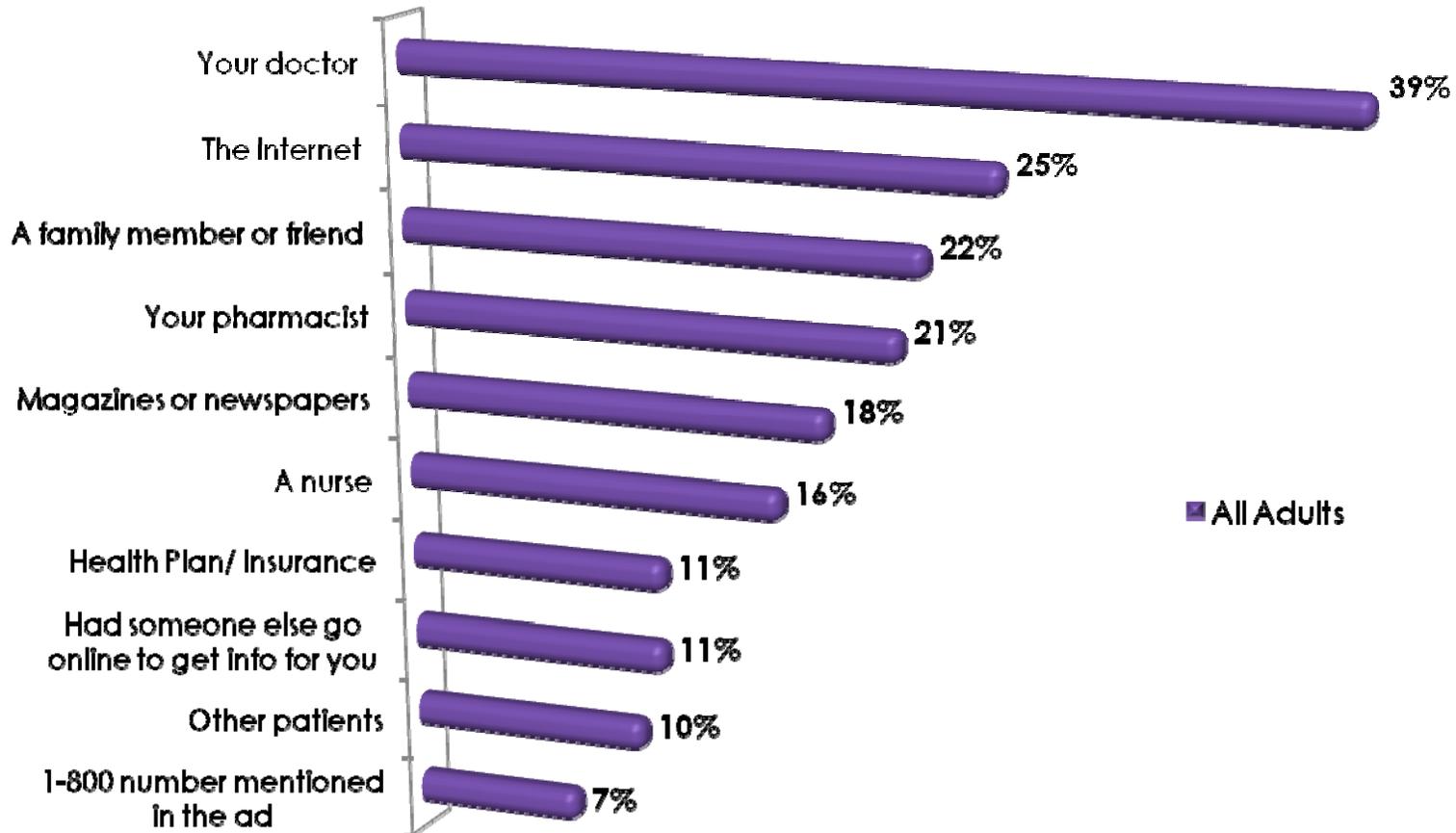
# Patients Online at Every Stage of Condition

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?



Among those who recall DTC ads

Source: Cybercitizen Health™ v8.0—Q3 2008

# Not All Information is Reliable

# Not All Recommendations are Safe

- Save Huge on Rx ED Meds

[CanadaDrugCenter.com/Viagra](http://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](http://ultimate-cancer-breakthroughs.com)

## Peanut oil for Pain

Try this effective pain relief  
product using peanut oils.

[www.FortexRubbingOil.com](http://www.FortexRubbingOil.com)

A good Detoxifying routine see [www.herbdoc.com](http://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](http://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/](http://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](http://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](http://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](http://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](http://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...](http://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

[Related Link](#)

Sponsored Links

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

Plus Drugstore Rewards 5% Off  
Buy Cheap Drugs, Call 1-877-223-9977  
[BigMountainDrugs.com/Lexapro](http://BigMountainDrugs.com/Lexapro)

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

Price Beat Guarantee. Money Back Guarantee. CIPA Certified. Save now  
[www.NorthWestPharmacy.com/Lexapro](http://www.NorthWestPharmacy.com/Lexapro)

[Lexapro Coupon](#)

Savings from Lexapro Coupon Codes  
Easy to Use by Email, Fax or Phone  
[www.OnlinePharmacyCoupons.com](http://www.OnlinePharmacyCoupons.com)

[Lexapro Escitalopram](#)

Generic: 20mg 90 Tabs \$88.00  
We Beat All Competitors' Price  
[CanadaDrugCenter.com/Lexapro](http://CanadaDrugCenter.com/Lexapro)

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

Premium Canadian Pharmacy.  
Free Shipping & Low Price Guarantee  
[PlanetDrugsDirect.com/Lexapro](http://PlanetDrugsDirect.com/Lexapro)

[Save on Escitalopram 20mg](#)

Generic \$45.97 100 Tabs  
Brand \$164.97 100 Tabs  
[www.CheapoDrugs.com/Lexapro](http://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

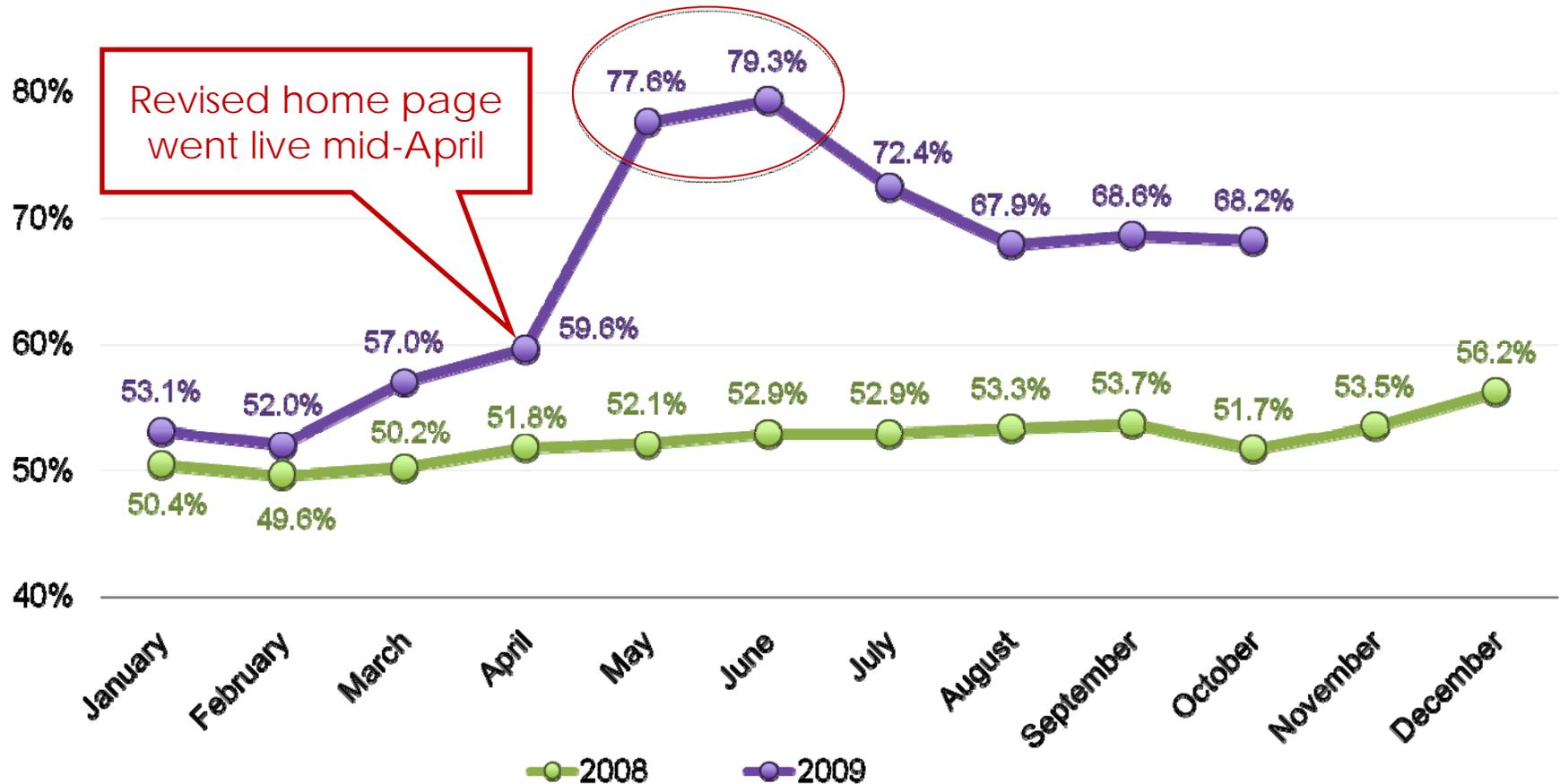
# Product.com: Reactions to Revised Safety Info

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.**

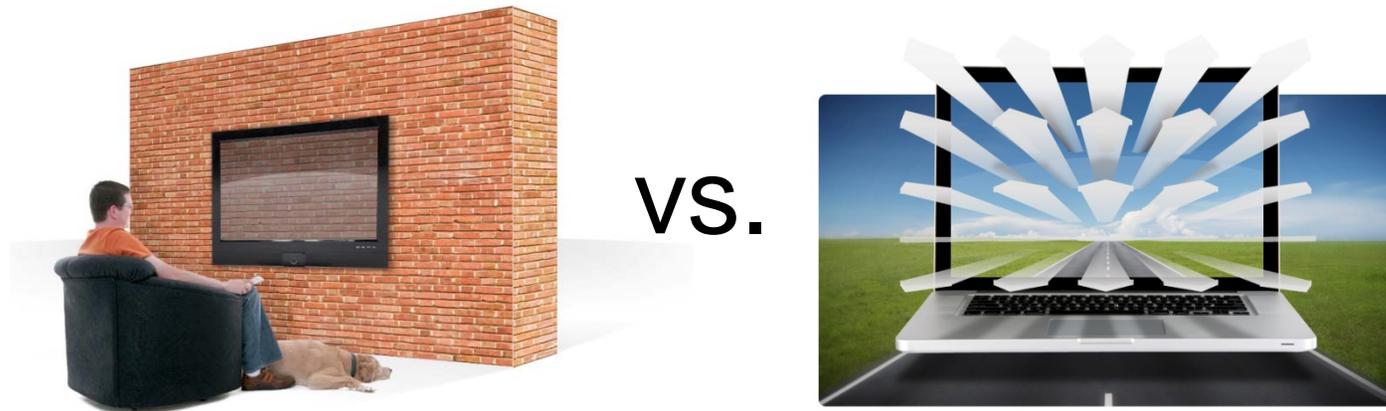
# Product.com Home Pg Bounce Rates



- New home page launched April 15<sup>th</sup>
- 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 exception<sup>1</sup>.
- > By issuing this provision, FDA recognized TV's importance and influence.



There are no guidelines specific to the Internet. Yet.

# Opportunities

interactive



connected

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 a web page layout for RxRISK. 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' and utility links '+ Text Size — | 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.
- Main 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.' Below this is a 'Watch Patient Stories' video player placeholder.
  - A paragraph of placeholder text: 'Indiction Statement iorem ipsum dolor sit amet, consectetur adipiscing elit. Quisque ornare semper mi ac suscipit. Vivamus pretium semper nulla, ut venenatis mauris vulputate nec. Ut leo ante, eleifend vitae auctor quis, fermentum at turpis. Duis vitae tellus elit, sed faucibus felis.'
  - A grid of six interactive elements:
    - 'Symptoms of Disease' with 'CLICK THRU SLIDESHOW'
    - 'How Condition Affects Your Body' with 'DISEASE MOA VIDEO'
    - 'How Product Works' with 'MOA VIDEO'
    - 'Long-term effects of Condition' with '3-D ANIMATED CHART'
    - 'Treatment Assessment' with 'INTERACTIVE POLL'
    - 'Payment Assistance' with 'TEXT'
  - A section for 'Important Safety Information' with placeholder text.
- Right Sidebar:** A 'SAFETY INFORMATION' section with a paragraph of placeholder text: 'Lorem ipsum dolor sit amet, consectetur adipiscing elit. Quisque ornare semper mi ac suscipit. Vivamus pretium semper nulla, ut venenatis mauris vulputate nec. Ut leo ante, eleifend vitae auctor quis, fermentum at turpis. Duis vitae tellus elit, sed faucibus felis. Cras sit amet tincidunt dui. Suspendisse ac arcu arcu. Ut egestas sagittis interdum. Sed sit amet nulla mauris. Ut dictum congue orci, in laoreet purus aliquam et. Donec lobortis, dolor vitae ullamcorper eleifend, libero lectus scelerisque lacus, in cursus erat eros ac quam. Lorem ipsum dolor sit amet, consectetur adipiscing elit. Quisque ornare semper mi ac suscipit. Vivamus pretium semper nulla, ut venenatis mauris vulputate nec. Ut leo ante, eleifend vitae auctor quis, fermentum at turpis. Duis vitae tellus elit, sed faucibus.''

# RxRISK in Limited Space

Short-form  
channels

=

Doorways to  
deeper  
content

# RxRISK: Search Advertising



## 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 ...

Hi, wendymaris Sign Out Help

Make Yahoo! your homepage Mail

YAHOO! Web Images Video Local Shopping More

lipitor Search Options

Search Pad  
SearchScan - 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](#)

**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

ADVERTISEMENT



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



**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**



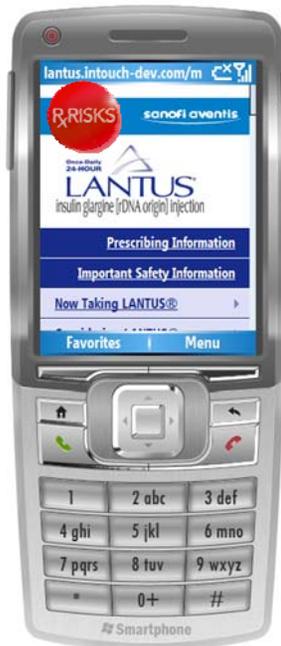
**Pristiq**  
desvenlafaxine  
EXTENDED-RELEASE TABLETS



Medication Guide &  
Prescribing Information

ADVERTISEMENT

# RxRISK: Mobile Communications



Remember to take your  
Producta today at 5 p.m.  
Read about risks at  
[ProductaRISKS.com](http://ProductaRISKS.com)



# RxRISK: Microblogging

The image shows a screenshot of a Twitter profile for a user named 'Producta'. The profile header includes the Twitter logo, navigation links (Home, Profile, Find People, Settings, Help, Sign out), and the user's name 'Producta' next to a red and white pill icon. The bio text reads: 'Providing information and support about Producta. Please also see ProductaRISKS.com'. This bio text is circled in red. The right sidebar shows statistics: 36 Following, 20 Followers, 0 Listed, 35 Tweets, and Favorites. Another red circle highlights the bio text in the right sidebar: 'Bio Providing info and support about Producta. Please also see ProductaRISKS.com'. The left sidebar also contains the bio text: 'Providing information and support about Producta. Please also see ProductaRISKS.com', which is also circled in red.

# 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.



Questions?

*Thank you*