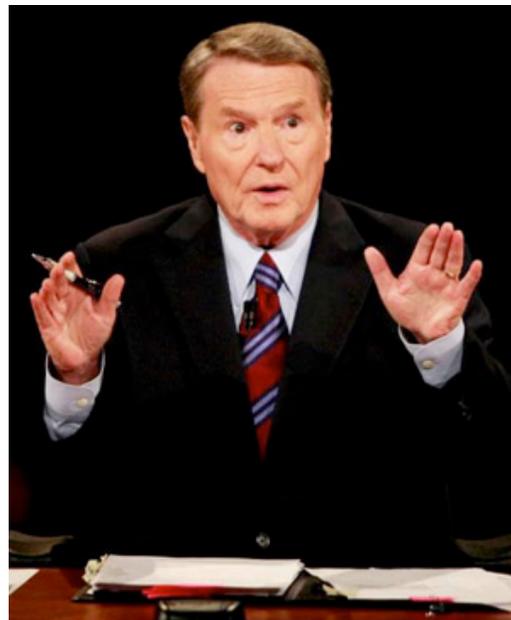## Survey Results

Moderation Best Practices for Pharma Social Networks

Pre, Post, or No Moderation… Whatever. You Must Have a Plan!

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PMN94-03

Find resources cited this article online at:
http://tinyurl.com/5hgxra

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http://www.news.pharma-mkting.com/PMNissueApr10archive.htm

As pharmaceutical companies attempt to interact with consumers and patients on social media networks they host, they are wary of overstepping undefined regulatory boundaries. One issue that requires clarification concerns accountability for user-generated content posted on these pharma owned and controlled social networks such as comments submitted to Facebook pages and YouTube channels.

While the FDA mulls over new guidelines that define those boundaries, pharma companies are launching new social media sites with increasing frequency. Although these sites may not be branded and may have Terms of Use specifying what is acceptable and unacceptable user-generated content, the question remains how to enforce those rules through moder-ation, especially with regard to handling of off-label information (see "How to Manage the Online Conversation"; PMN Reprint #94-02).

Although moderation is a moot point at the moment (almost all pharma social media sites have comments turned off) it is important to have a moderation strategy designed to meet your specific goals when and if you build a truly interactive social network.

"Some pharma companies are trying to do social media without having very much interactivity," pointed out Jenna Woodul, Liveworld's EVP and Chief Community Officer, in a recent Pharma Marketing Talk podcast (listen: http://bit.ly/aN9bGj).

To determine what the best moderation practices are appropriate for pharma social media sites, *Pharma Marketing News* and Blog asked readers their opinions. Responses to an online survey were collected from 14 to 24 April 2010 for analysis. While only 23 responses were collected, the results and respondent comments may help you put the issues into perspective. You can still take the survey here: http://bit.ly/9kj99g

A Hypothetical Case
The survey asked respondents to consider a hypo-thetical consumer/patient focused social network site that is owned and operated by a pharmaceutical company. It could be an "unbranded" disease infor-mation site or it can be a branded product support site. Visitors are allowed to submit comments to be posted to the site. The goal is to offer information and support through active discussions among site visitors and between visitors and the pharmaceutical company. The site's Terms of Use specify what types of comments are acceptable and how they will be moderated.

To Moderate or Not to Moderate?
The survey asked: To enforce the site's Terms of Use policy, what type of moderation should be employed?

- Pre-screening comments BEFORE they are posted
- Post-screening comments AFTER they are posted
- NO screening/moderation at all

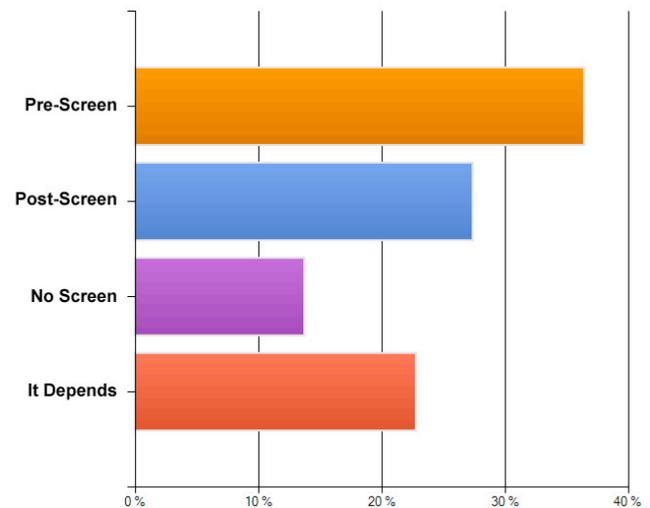The survey results are shown in Figure 1, below.

Figure 1. Moderation Survey Results: To enforce the terms of use of the site, what type of moderation should be employed?

Comments in favor of PRE-SCREENING included:

"You have to pre-screen comments before they're posted," commented Nicole Rivera, Product Marketing Manager at SMI Health Media (http://www.smihealthmedia.com/). "The majority of people posting these comments are patients, and the only medical knowledge many of them have is what they read on the Internet. You can't allow people without medical degrees to post side affects from various drugs. Sometimes they're having these side affects because they suffer from something else, and it's unrelated to the drug. I'm not saying that is always the case, but to have unsubstantiated medical advice all over the Internet is quite scary. I'm all for free speech, but I also like facts."

Comments in favor of POST-SCREENING included:

"I feel pre screening is not consistent with the meaning behind social networking," said Steve Massi (http://twitter.com/stevemassi), a consultant to the pharmaceutical industry.

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"Only insulting or other otherwise non socially acceptable comments should be moderated," said an anonymous consumer respondent. "Negative comments about product/company are acceptable otherwise we become China."

"Screening could very well lead to censorship," said an anonymous respondent who works for a pharmaceutical company. "I think comments should be screened in general to avoid misleading information and potential liabilities, but after they are posted so it's clear the company is not censoring in the first place. In cases of difficult comments the company needs to have a well-thought out strategy/SOP in place to handle and respond appropriately."

Unmoderated Discussions

It seems unlikely that any pharma social network would not employ any form of moderation. Nevertheless, the survey asked respondents: In the case where NO MODERATION is employed or possible, please indicate whether you agree, disagree, or have no opinion regarding the following statements.

- The company's brand will suffer because of illegal, inappropriate, inaccurate, or misleading comments no matter what corrections are posted.
- Users will suffer because of exposure to illegal, inappropriate, inaccurate, or misleading comments no matter what corrections are posted.
- The company can always counteract any illegal, inappropriate, inaccurate, or misleading comments with its own truthful statements.
- The community of users, apart from the company itself, will self-correct any illegal, inappropriate, inaccurate, or misleading comments.

The survey results are shown in Figure 2, below. Respondents who submitted comments, made the following points:

- Unmoderated discussion is the essence of social media
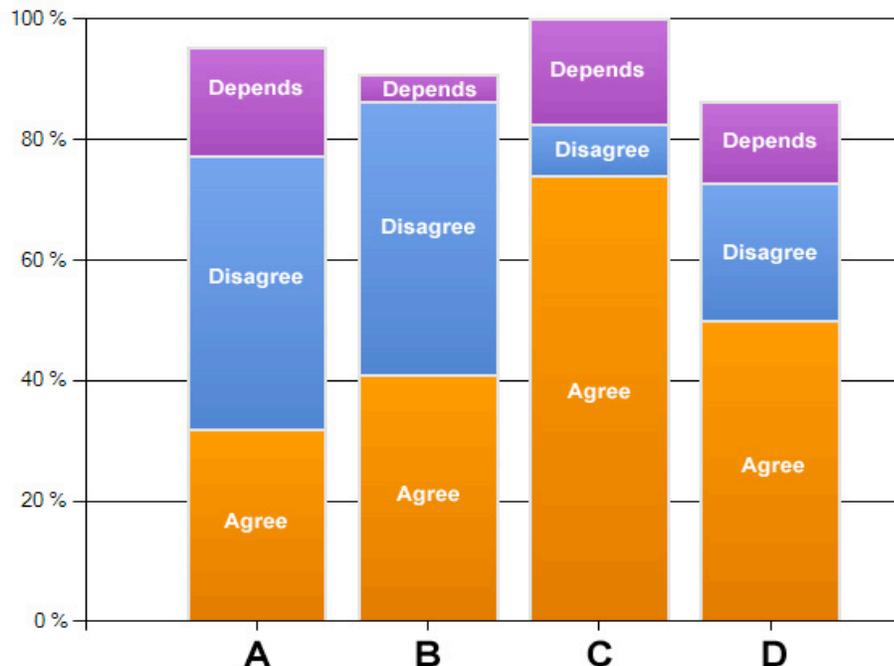- Unmoderated discussions may lead to inaccurate information

Continues…

Figure 2. Moderation Survey Results: In the case where NO MODERATION is employed or possible, please indicate whether you agree, disagree, or have no opinion regarding the following statements. A = "The company's brand will suffer because of illegal, inappropriate, inaccurate, or misleading comments no matter what corrections are posted." B = "Users will suffer because of exposure to illegal, inappropriate, inaccurate, or misleading comments no matter what corrections are posted." C = "The company can always counteract/correct any illegal, inappropriate, inaccurate, or misleading comments with its own truthful statements." D = "The community of users, apart from the company itself, will self-correct any illegal, inappropriate, inaccurate, or misleading comments."

Comments included:

"I think that once the 'genie is out of the bottle' you can't put it back in," said an anonymous respondent who works for a pharma agency. "So even if a company provides correcting information to a post, it will be seen as them being self serving. Also, it is very difficult to post correcting information against a determined poster, or group of posters, who can inundate the board with 'negative' posts."

"My experience with healthcare social media tells me that there is less negative/inappropriate discussion than many companies fear they will see," said Melissa Davies (http://bit.ly/cR6lLG), Social Media Practice Lead, Return on Focus. "In general, discussion tends to be aimed at helping other patients rather than disparaging companies, and online commun-ities do tend to self-police to eliminate highly inappro-priate comments. For me, the greater concern would be around comments that are inaccurate or misleading, but not obviously so -- other users may not realize that a comment that seems reasonable actually gives the wrong advice. Also, as the Sanofi-Aventis case proves, online discussion is not immune to comments by angry/frustrated users who want to disparage the brand, and after-comments by a company may not be enough to mitigate the negativity generated by a passionate and angry consumer."

"There must be a proactive, consistent effort to manage site rogues, but the essence of a social site is open interaction, engagement and connection," said Steve Massi.

"In my opinion this will depend on the brand and what has been said/done," said an anonymous respondent who works for a pharma agency. "If it's visual, video posting, I think that could be much more impactful (eg Dominos) however open forums people could feel the need to defend/protect a brand (against an attacker) as it's less candid. This is why companies need crises/issues management plans."

"There is no situation where moderation isn't possible," said Jonathan Richman (http://bit.ly/aujaGz), Director of Strategic Planning, Bridge Worldwide. "It's a bit tougher on some sites (eg., Facebook) than others, but there is always a technical solution to allow for moderation of comments."

Does Pre-Screening Inhibit Discussion?

What is the justification for pre-screening? As pointed out by at least one respondent, no matter how noble the intent, pharmaceutical companies may be judged as censors if they pre-screen every comment before it is posted. Nevertheless, this is common practice these days, especially for pharma corporate blogs such as JNJBTW and GSK's More Than Medicine. However, experts such as Jenna Woodul, believe that pre-screening should only be used in certain situations (see "How to Manage the Online Conversation"; PMN Reprint #94-02).

The survey asked: Indicate whether you agree, disagree, or have no opinion regarding the following statements about PRE-SCREENING (screening BEFORE post is published)

- Prevents misinformation (including off-label drug information) from being published and then possibly propagated throughout the Internet.
- Keeps the site from being overrun by spam or other malicious posts.
- Requires too many resources (ie, FTEs) or nearly impossible to do in a timely fashion considering the 24/7 nature of online discussions.
- The delay -- even a short delay -- before posts appear will inhibit the use of the site and make it virtually useless.

The survey results are shown in Figure 3, page 5. Respondents who submitted comments, made the following points:

- Pre-screening will have a dampening effect on the conversation
- Pre-screening requires lots of resources
- Pre-screening can prevent controversy

Comments included:

"Yes a site will lose it's 'feel'," said an anonymous respondent who works for a pharma agency. "I'm thinking it will reduce the amount of people who actively participate but I don't necessarily think it becomes useless."

"Pre-screening will certainly have a dampening effect on the authentic nature of the discussion, and may cause users to think of the community as a forum for dialogue with the company but not for real-time conversations with one another," said Melissa Davies. "However, if people see an opportunity to talk openly with the company to get information they need, is that a bad thing?"

"Pre-screening posts will require a lot of resources, but if you want to play the game…," said an anonymous respondent who works for a pharma agency.

"The bigger issue is the sense that screening will be used to mask issues or avoid competitive mentions, etc.," said Mark Dimor (http://bit.ly/9F1kub), President, The BioContinuum Group.
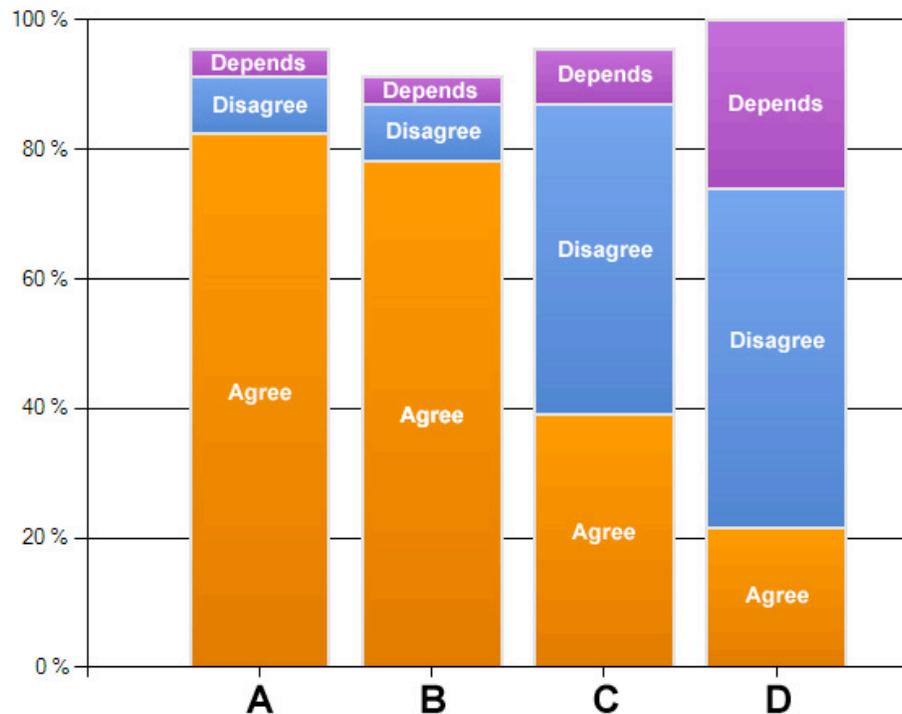
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Figure 3. Moderation Survey Results: In the case where PRE-MODERATION is employed, please indicate whether you agree, disagree, or have no opinion regarding the following statements. A = "Prevents misinformation (including off-label drug information) from being published and then possibly propagated throughout the Internet." B = "Keeps the site from being overrun by spam or other malicious posts." C = "Requires too many resources (ie, FTEs) or nearly impossible to do in a timely fashion considering the 24/7 nature of online discussions." D = "The delay -- even a short delay -- before posts appear will inhibit the use of the site and make it virtually useless."

"In most cases, there is only a small expectation among consumers that their comments will be posted immediately," said Jonathan Richman. "This is especially true if you make it clear to people that their comments won't be posted immediately and explain what types of comments are appropriate."

"Regarding the 'delay' - my experience is that the stuff that moves 'fast' is the controversy, which you would not want surrounding your drug," said an anonymous respondent.

Post-Moderation Best Practices
In comments submitted to the FDA, a group called the "Social Media Working Group" (SMWG) comprised of representatives from Amgen, AstraZeneca, Bristol-Myers Squibb, Millennium Pharmaceuticals, and sanofi-aventis U.S., suggested a post-moderation policy. With regard to responding to unsolicited request for off-label information, the SMWG recommends that the site "retain the off-label request posting, along with the company acknowledgment, to ensure the community is informed of its off-label nature. This avoids the risk of an off-label ques-

tion being viewed without clarification" and also avoids, as the SMWG says, "undue censorship." The SMWG is a bit vague on how long off-label posts should be retained and leaves it up to individual companies to decide: "The company would remove the off-label posting/statement within a reasonable time to ensure availability of this information is limited. Companies should also determine criteria for type of information to be addressed/corrected and length of time information would remain online."

The PMN survey explored several post-moderation options to determine what might be best for pharma. The survey asked: Indicate whether you agree, disagree, or have no opinion regarding the following statements about POST-SCREENING (moderation AFTER post is published)

• Review all new posts in a timely fashion (eg, within 48 hours).

• Before deleting posts, publish a response indicating that the post violates the terms and will be deleted.
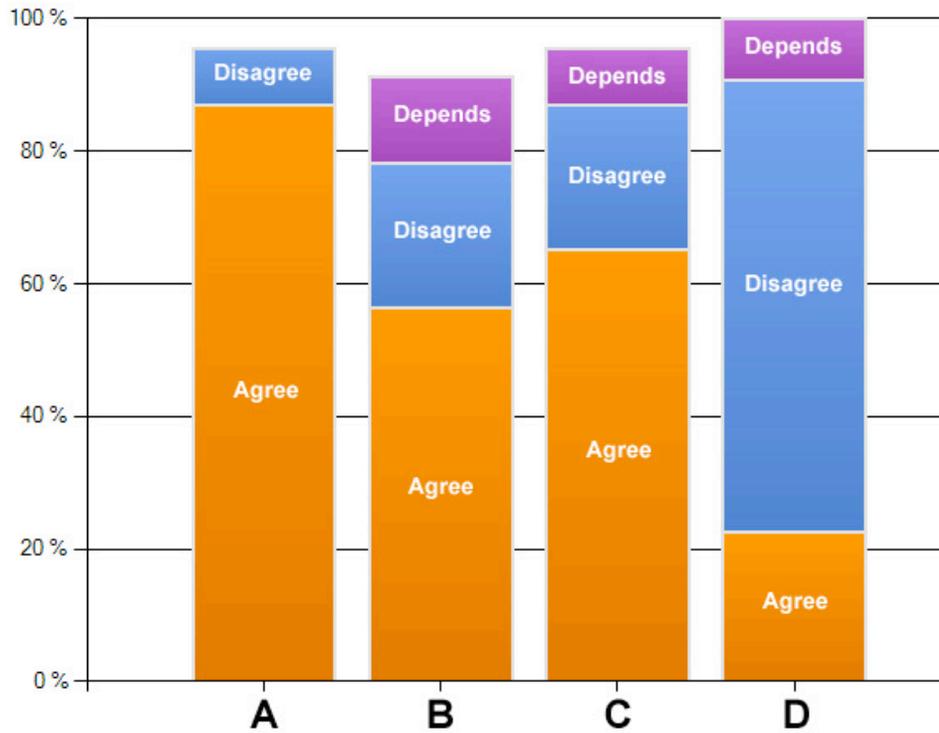
Figure 4. Moderation Survey Results: In the case where POST-MODERATION is employed, please indicate whether you agree, disagree, or have no opinion regarding the following statements. A = "Review all new posts in a timely fashion (eg, within 48 hours)." B = "Before deleting posts, publish a response indicating that the post violates the terms and will be deleted." C = "When posts are deleted, perform a 'soft delete,' which shows that a post was deleted and why it was deleted." D = "Do a 'hard delete' (remove completely with no remaining record that the post existed)."
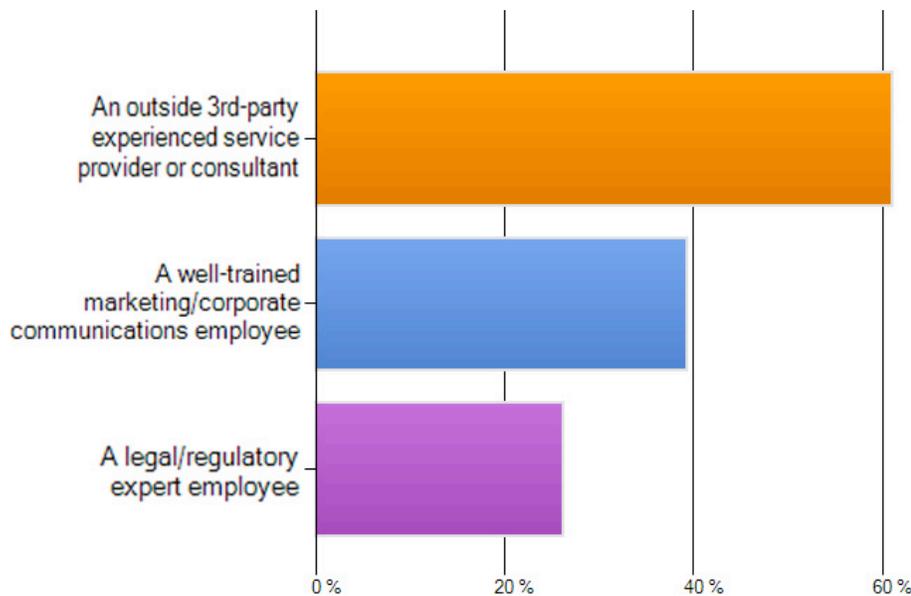

Figure 5. Moderation Survey Results: Whatever the type of moderation option used, who is the best choice for moderator?

- When posts are deleted, perform a "soft delete," which shows that a post was deleted and why it was deleted.
- Do a "hard delete" (remove completely with no remaining record that the post existed).

The survey results are shown in Figure 4 (pg 6). Respondents who submitted comments, made the following points:

- The best practice for post-moderation may depend upon the nature of the comment
- Whatever the post-moderation practice, the process should not take longer than 8 hours (92% of respondents agree) and never as long as 48 hours

Comments included:

"I think informing the person whose post is being deleted is appropriate, but by doing a soft delete, you're informing that posts are being deleted," said an anonymous respondent. "Users will be suspicious, in fact, it might even discouraging them using the site."

"Soft-delete vs. hard-delete needs a clear decision tree/policy within the company," said Melissa Davies. "Hard-delete should be used only in cases where comments are very incorrect, very misleading, illegal or very damaging. Otherwise, soft-delete is the more transparent approach."

"I don't think any posts (other than spam or malicious comments) should be deleted," said Salil Kallianpur, Group Product Manager, Pfizer Ltd. India and author of My Pharma Reviews Blog (http://bit.ly/axATog). These comments offer pharma a great opportunity to interact with consumers and set the record straight for future users. Deleting comments gives an impression of control which may dissuade genuine users from commenting or using the site, therefore defeating the entire purpose of having a SM strategy."

"This all depends on the comment," said Jonathan Richman. "Some moderation actions require no explanation, others might need some explanation as to why the comment was deleted. This is all dependent on there being some sort of moderation rules about what comments are permitted. If this exists, then the deletion of comments never looks arbitrary."

Who Should Moderate?

Moderation requires resources; ie, trained personnel. This is discussed in more detail in the article "Online Pharma Community Management." The survey asked: Whatever the type of moderation option used, who is the best choice for moderator?

- A well-trained marketing/corporate communications employee

- A legal/regulatory expert employee
- An outside 3rd-party experienced service provider or consultant

The survey results are shown in Figure 5 (pg 6). Respondents who submitted comments, made the following points:

- Pharma company staff employees may not make the best moderators
- Moderators must have many skills and bridge many needs
- Moderation can be an expensive process

Comments included:

"Ideally the person is someone who understands the treatment well (best uses, best practices) and who can bridge the needs of the company (staying on message, following MLR guidelines) and the consumer (quick turnaround, quality/factual information, friendly/accessible approach)," said Melissa Davies.

"Listening, probing and empathetic interaction are critical skills," said Steve Massi.

"Moderation should be best performed by its community members," said an anonymous respondent.

"An objective third party, preferably a team of two, one a lawyer and one a physician," said Nicole Rivera.

"It is best for company executives to not moderate since bias is bound to creep in at some point of time," said Salil Kallianpur. "It is best to allow 3rd party moderators who work with full information of the company and its products to moderate discussion."

"I think two of these could work (ie, not a legal person)," said Jonathan Richman. "It would require an internal person dedicated to the task though, which concerns me. External people can do just as well if given proper guidance and typically do it faster and much cheaper since this is their only focus."

Thanks to everyone who responded to this survey. The survey is still open for comments here: http://bit.ly/9kj99g

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