

# Good Promotional Practices: Are You Ready?



The rules and regulations applicable to promoting life science products continue to expand along with the number of enforcement personnel. Consequently, navigating these rules and regulations efficiently has never been trickier for companies in the industry. From exhibiting at multifaceted trade shows to conducting product training and education, to providing information on insurance coverage, reimbursement and health economics, the scope of “good promotional practices” (GPP) is immense. It helps, then, to divide and conquer the various elements to ensure compliance.

One dimension of GPP that receives a great amount of time and attention is the development and distribution of sales materials—how they are developed and vetted, what they say, and who receives them. Ensuring the right material gets to the right audience and tracking the distribution of information are processes critical to companies’ success. To distribute targeted and accurate promotional material while also preventing inappropriate delivery, life science companies must make sure practices are in place that meet customer information needs, protect the organization, comply with regulations, and build the business. This requires stepping back and assessing the quality and effectiveness of existing promotional development and review processes, and identifying what changes are needed where.

This article is the first in a series addressing issues related to understanding and implementing good promotional practices, which keep businesses growing and allow everyone—sales, marketing, legal, medical affairs—to rest easier and work more efficiently.

## Good Promotional Practices

Good promotional practices (GPP) refer to the composite set of policies and standard operating procedures that ensure life science companies comply with applicable laws, ethics codes, and accepted industry standards. By adhering to GPP, life science companies can ensure that they maintain good standing as respected, ethical providers of valued information to the healthcare practitioner community.

## The Complexity of Achieving Good Promotional Practices

The landscape in which pharmaceuticals and medical devices are developed and marketed is becoming more complex, both inside and outside the walls of the average life science company. Regulatory, compliance, and legal restrictions, as well as customer and consumer expectations, are in an almost constant state of evolution, requiring companies to understand and respond to them in a timely manner.

While customers and consumers want easy access to the most up-to-date product information, federal authorities in the United States, including the Food and Drug Administration and the Department of Justice, as well as similar bodies in Asia and Europe, are undertaking increasing levels of oversight and enforcement actions related to promotional activities and materials.

Meanwhile, at life science companies the environment is becoming more complicated. In a down economic cycle, most organizations have less time and fewer sales and marketing resources to serve more sites and take advantage of the increasing variety of dissemination channels. Consequently, many manufacturers are facing a challenging situation; they must be more efficient and effective, with fewer resources.

This has led some organizations to review every aspect of their promotional processes, from how materials are conceived and work their way through the approval process, to how they are distributed and eventually obsoleted. The end goals are to make each step more efficient, deliver on customer expectations and, of course, ensure regulatory compliance.

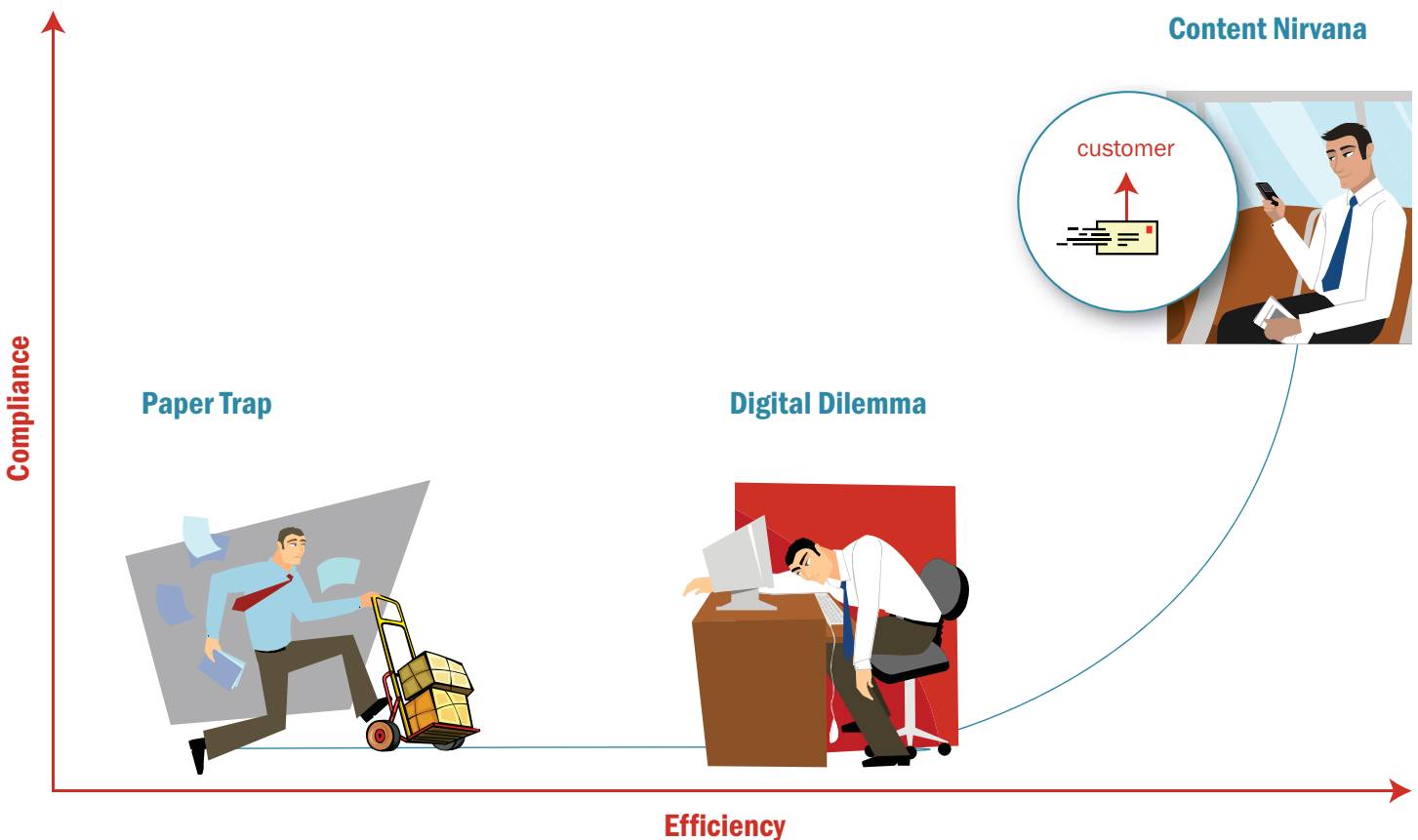
Companies are finding that promotional processes and tools conceived in the not-too-distant past may not meet the standards of accessibility customers and consumers want. They may also fall short of providing the traceability (having a competent record of where promotional materials went) and accountability (who used what promotional piece when) that more recent regulations appear to impose. In addition, a more geographically distributed, highly mobile sales force needs continual access to the right materials without having to return to the regional or home office.

## Promotional Processes: An Evolutionary Challenge

Life science companies need to evolve their promotional processes to stay in sync with changing requirements. However, when it comes to organizational processes, different life science companies can be at disparate stages of evolution or adoption, even though they operate in the same industry and must adhere to the same regulations.

**Figure 1, Promotional Process Adoption Curve**, outlines how promotional processes have evolved, and identifies the major stages on the adoption curve that most life science companies make. Do you know what stage on the curve best describes your company? Is it moving forward toward greater efficiency, control, and compliance—or is it retreating?

Figure 1. Promotional Process Adoption Curve





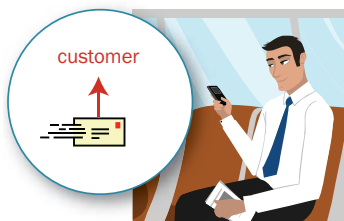
Companies that have been around for at least a decade are familiar with **Stage 1, Paper Trap**, where materials are developed based upon sales team needs, and reviewed by one or a number of internal personnel on an as-needed basis. Once produced, marketing sends sales materials out to the sales force or sales personnel order these tangible materials in bulk. Then, sales personnel haul their veritable library of hard copies around with them as they make sales calls. It would be nice to believe all the brochures and videos in the trunks of salespeople's cars or in their home offices are

up-to-date and compliant. However, materials remain with the sales teams until they are used up, with little effort to track consumption by the sales teams or the customers. Some feedback may filter back to marketing, but evaluation is more ad hoc than systematic. Try as they might, most salespeople are not able to tame the paper blizzard completely. It is difficult and time-consuming to distinguish different versions of the same material, and constantly cull obsolete copies. Therefore, misdirection of some materials or use of out-of-date communications is almost a certainty.



By moving to **Stage 2, Digital Dilemma**, the paper blizzard has calmed somewhat because the hard copies have now gone digital, with information moving onto the hard drives of salespeople's laptops and other mobile devices. This phase certainly offers some improvements. Internally, there are improvements in the development and review cycle, as a cross-functional team plays a predictable and larger role in evaluating and approving materials at the concept stage. In addition, the speed and logistics of accessing and transmitting materials have improved, as digital files become the

preferred format. But this stage also presents some challenges because unlike hard copies, digital materials can be edited, copied or transferred onto flash drives, or easily cued up for viewing at the touch of a button, if they are not adequately protected. While having an electronic library certainly cuts down on the volume of paper carted around—and hopefully recycled once print materials become out-of-date—control and accountability over distribution of materials may suffer.



**Stage 3, Content Nirvana**, is the next evolutionary step: having centralized control and monitoring abilities over promotional materials, while ensuring employees have continuous access to the best, current materials for distribution to approved audiences. In this stage, the sales teams are relieved of much of their burden for tracking and obtaining feedback on materials, as both tasks are automated. The automation allows for development of an electronic record documenting distribution, a clear advantage when gauging impact and access. This would

be a small evolutionary step for some companies and a giant leap for others. However, because the dual objectives for most life science companies are optimal efficiency and total compliance, getting to this stage should be every organization's goal.

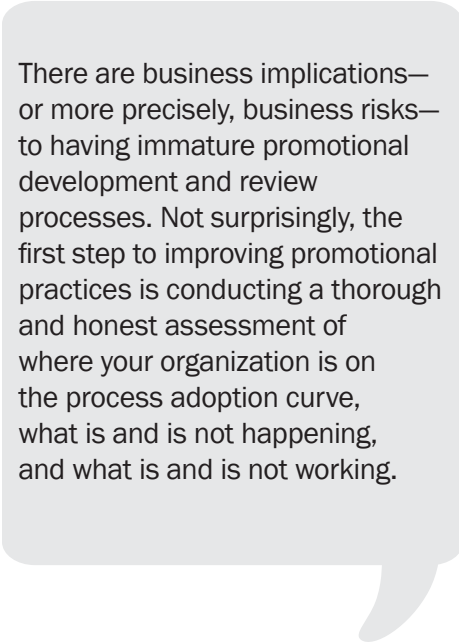
In reality, most companies and individual salespeople are not in a static place, but in motion along the continuum. Different companies—even different units within companies and salespeople within those units—evolve at different speeds. Why? One reason is that companies have to make choices when investing in process improvement. Consequently, with many resources devoted to or focused on regulatory compliance, improving the efficiency of promotional processes frequently is not prioritized.

The result is many companies are somewhere between the Digital Dilemma and Content Nirvana stages, where there is some centralized tracking of distribution, but not a comprehensive system that actually facilitates quick sales follow-ups, develops traceable communication records, and enforces distribution rules.

Unfortunately, being in-between these stages and moving between stages in different parts of the same company can be inefficient, as well as potentially expensive. Attorneys and employees who have lived through the pain of trying to trace the distribution of materials that are the subject of litigation or an enforcement action know this well. It is not unusual for discovery and recreation of a distribution trail to be at least 50 percent of the cost of litigation, and sometimes much more, as information technology experts spend hours analyzing mobile devices, cell phone texts, and other digital records to document communications.

Human nature—specifically, how difficult it is for people to change their behavior—is another reason why evolving practices to the Content Nirvana stage is a challenge. Many salespeople at life science companies have significant experience within the industry. They bring a great deal of insight to the table when relating to customers and developing promotional materials. However, they may also bring habits, and perhaps some inflexibility and biases about how best to serve the company, or a particular customer. What was acceptable at one company may be pushing the envelope at another firm, and successful standard practices five years ago may be less acceptable now.

So, while different companies can be expected to be at different positions on the adoption curve, there are business benefits to being further along. Salespeople will be better able to meet customer demands while minimizing business risks when companies commit to evolving and improving their promotional practices. The key to improving promotional practices is conducting a thorough and honest assessment of where your organization is on the curve, what is and is not happening, and what is and is not working. Only with a clear diagnosis can a company standardize processes at a higher level of efficiency and effectiveness. Process improvement techniques that manufacturing industries have used for decades aim to diagnose, quantify, and standardize best practices. The same approach can be used for promotional development and review processes in the life science industry.



There are business implications—or more precisely, business risks—to having immature promotional development and review processes. Not surprisingly, the first step to improving promotional practices is conducting a thorough and honest assessment of where your organization is on the process adoption curve, what is and is not happening, and what is and is not working.

---

## Finding Your Place on the Adoption Curve

No matter where a company is on the process adoption curve, their end goals are generally the same: to have reliable, efficient procedures that support business growth and ensure regulatory compliance. That is, to move closer to Stage 3, Content Nirvana. Getting there requires an in-depth analysis of the current situation, an investment that yields a host of benefits.

**Focus on organizational structure first.** How to get started? The best way to understand whether and how your content workflow is really humming is to follow a new content piece (brochure, ad copy, DVD) through your organization and its life outside your organization. This journey typically starts by visiting the creative teams (both internal marketing and agencies) as they conceptualize a piece and move it through approval processes. Then follow the approved piece through production, release and distribution. After the piece has been out in the field, you will want to get a clear understanding of how feedback and follow-up are managed.

By following the piece this way you will get a good read on whether your organization's structure actually helps or hurts the workflow. At times, structure (and related processes) can be changed more easily than mind-sets and work habits. Accordingly, pay special attention to how quickly the piece moves through approval, and whose eyes (and hands) see it and evaluate it. Questions to consider include:

1. Is there a standing team assigned to participate in review and approval meetings, or does the content piece need to make multiple stops in functional departments?
2. Is a cross-functional team involved early, in the creation stage, or does a product marketing team toss things over the transom or drop it in the in-box late in development (thus inhibiting comprehensive input)?
3. Are all the participants in the creation, development and review processes (sales, compliance, legal, quality assurance, marketing and external communications) aware of the latest compliance regulations so that they can provide valuable input? If not, what would it take to keep everyone informed?
4. Finally, have the majority of the participants in the content creation and review cycle walked in a salesperson's shoes? That is, can they empathize with the need to get good content to healthcare professionals in a timely way?

The core idea is to delve into your content workflow deep and long enough to see what works and what needs fine-tuning. Once you understand how your organizational structure affects your content workflow, you can make adjustments designed to move your promotional processes up the adoption curve toward Content Nirvana. To guide your evaluation, **Figure 2, Content Life Cycle Worksheet**, identifies types of activities or outcomes you should look for so you can more accurately determine where to focus your attention.

Figure 2. Content Lifecycle Worksheet

	Paper Trap	Digital Dilemma	Content Nirvana	
<b>Development and review</b>	<b>Content Concept Review</b>	<input type="checkbox"/> None	<input type="checkbox"/> Ad hoc	<input type="checkbox"/> Marketing presents concept to cross-functional team for buy-in prior to creative development
	<b>Content Design Freeze</b>	<input type="checkbox"/> None	<input type="checkbox"/> Ad hoc input solicited	<input type="checkbox"/> Marketing presents design at freeze stage to cross-functional team for buy-in prior to starting final creative
	<b>Content Final Approval</b>	<input type="checkbox"/> 1:1 Divide-and-conquer negotiation for sign-off	<input type="checkbox"/> Cross-functional review at final	<input type="checkbox"/> Cross-functional review with clear classification/consistent rule application
<b>Production and distribution</b>	<b>Content Production</b>	<input type="checkbox"/> Tangible items produced in larger quantities to save costs	<input type="checkbox"/> Tangible items being ordered in smaller quantities and replaced by digital content	<input type="checkbox"/> Predominantly (>50%) digital content, organized for easy access by sales
	<b>Content Ordering</b>	<input type="checkbox"/> Phone	<input type="checkbox"/> Online	<input type="checkbox"/> Mobile
	<b>Content Distribution</b>	<input type="checkbox"/> Tangible items picked, packed and shipped	<input type="checkbox"/> Intranet or online/downloadable	<input type="checkbox"/> Mobile/not downloadable
	<b>Content Tracking</b>	<input type="checkbox"/> No tracking of sales consumption	<input type="checkbox"/> Ad hoc tracking of sales consumption	<input type="checkbox"/> Automated tracking of sales consumption
<b>Feedback and follow-up</b>	<b>Content Feedback Loop: Sales</b>	<input type="checkbox"/> Ad hoc collection of sales feedback	<input type="checkbox"/> Sales advisory board to marketing	<input type="checkbox"/> Automated, immediate, closed-looped. Active Sales Advisory board
	<b>Content Feedback Loop: End customer</b>	<input type="checkbox"/> Ad hoc collection of customer feedback	<input type="checkbox"/> Customer advisory board to marketing	<input type="checkbox"/> Automated, immediate, closed-looped
	<b>Change Control/Obsolescence</b>	<input type="checkbox"/> Relies on sales to stock and scrap	<input type="checkbox"/> Relies on sales to check for new content	<input type="checkbox"/> Automated propagation of digital content, sales-friendly availability
	<b>Response to Feedback</b>	<input type="checkbox"/> Use up tangible items	<input type="checkbox"/> Use up tangible items; upload new content for sales force to download online	<input type="checkbox"/> Revise digital content and upload
<b>Number of Responses</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>	
	<b>X = 1</b>	<b>X = 3</b>	<b>X = 5</b>	
<b>Points</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>	
		<b>Total Points**</b>	<input type="text"/>	

\*\*If your worksheet total is 40 points or above, congratulations – you are on your way to Content Nirvana! If your score is between 20 and 39 – you are in the Digital Dilemma stage and should incorporate new approaches and tools to make your processes more efficient and effective. Fewer than 20 points – you should begin the journey by selecting product line(s) to convert from print to digital assets.

**Moving up the adoption curve.** As rules and regulations become more complex and expensive to comply with, there is a clear business case for evolving promotional processes so they move up the adoption curve. Committing to developing these processes and moving up that curve will protect the business, support growth, ensure compliance, and institutionalize good promotional practices.

Get started by interviewing participants in the promotional process, from marketing managers in charge of creating the piece to end-users on sales teams, as well as those involved in the review cycle. Your goal should be to determine their likes and dislikes, what makes their jobs easier, and what prevents them from being efficient. This exercise will generate great ideas for improvement, but also will build goodwill and lay the groundwork for buy-in to any changes needed.

Addressing organizational structure is also key – specifically having a cross-functional team that has the insight and authority to keep the content workflow moving. Ideally, the content development team and review committee would begin working together when a promotional piece is in the concept stage. This creates a feedback loop to provide input before significant resources are spent.

Companies should use proven tools and processes that allow them to navigate today's complex regulatory environment successfully and cost-efficiently. This way they can stay ahead of the curve and their competition.

