

CEO Blog: Responsible Marketing in the New Media Age

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By their nature, pharmaceutical products create special challenges for marketers. Because regulation dictates so much of what you can say and how you say it, it has been necessary for marketers to be very conservative in the communication approaches they've adopted in advertising and promotional materials.

And that's as it should be. No one questions the need for special caution when it comes to products that affect our health and well being.

But how are the dictates of responsible marketing faring in the new world of social media. Regulations designed for a world of 30-sec. commercials and informational brochures seem somehow of different relevance in the age of YouTube, Twitter and Foursquare.

Consider just one small aspect of social media: mobile devices. Researchers predict that the mobile Internet – in which consumers access the Internet over mobile devices – will soon overtake fixed Internet. And many newcomers to this country use more mobile devices than PCs or laptops to connect to the Internet.

In addition, the mobile internet is becoming more video-based. We know that text can appear differently on a computer screen than on the printed page. But the way in which information is rendered in a video can be wide-ranging. Imagine viewing a video on a cell phone screen instead of on a PC. Might a consumer watching that video on a cell phone possibly miss seeing the fair balance information?

It's not that we don't have guidelines. Companies can turn to the Food & Drug Administration's (FDA) communications guidelines published by the Division of Drug Marketing, Advertising, and Communications (DDMAC). There's also the voluntary Pharmaceutical Manufacturers Association (PhRMA) Guiding Principles on Direct to Consumer Advertising. The problem is that these guidelines have not caught up with new media available to marketers and consumers today. And the FDA once again has postponed issuing appropriate guidelines in this important area.

So what are marketers to do? First, companies and their agencies need to make sure they understand and are fully implementing the FDA guidelines that do exist. Some marketing agencies have called in organizations like the Center for Communication Compliance to create training programs on regulatory compliance for their employees. And a number of agencies are implementing formal certification programs. We, at Omnicom, have done this.

And, we have gone a step further and have developed a HIPPA compliant Mobile Health Library for our clients. We believe that tools like this will become increasingly important as the Internet – and interaction with consumers – continues to evolve.

Second, the marketing and regulatory departments within pharmaceutical companies need to work arm in arm. While there is always a natural give and take between these in-house personnel, they need to recognize that they are in this together and have a singular purpose – timely, relevant clinically correct brand communications. Only by joining forces will they be able to navigate the new world of social media in a responsible and meaningful fashion.

And navigate they must. The absence of social media guidelines from the FDA has somewhat slowed adoption of new media approaches in the pharmaceutical industry as compared to other less regulated industries. But there is now widespread recognition that companies can no longer afford to wait. The risks of not using social media are now seen as greater than the possibility of a potential marketing misstep. So, caution with our eyes wide open is the best prescription.

Marketers are realizing that regardless of media environment, the operative question is still the one that frames all marketing programs in the pharmaceutical industry: Is this action in the best interest of the patient? This has always been true of off-line communications and is equally important with all on-line conversations.

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