
Technology Optimized Content*

With the sheer volume and complexity of promotional materials today, it's not surprising that busy professionals would benefit from technology that provides extra support during the review process. Workload keeps growing, organizational resources are constrained, and there is only so much that anyone can remember and retain.

Technology revolutionized MLR review through the introduction of cloud-based content management platforms. Thanks to Service as a Software (SaaS), MLR review teams combine creation, review, and distribution capabilities for easy review and approval, in addition to automating content distribution and withdrawal across channels.

Yet, there remains an untapped opportunity to use technology for optimizing the quality of the promotional content that gets uploaded into these systems before the review begins, or during the review process. Content quality is optimized when promotional materials:

- Do not violate any well-established requirements that are not risk tolerance issues.
- Address FDA guidances which include many sub-requirements.
- Have no editorial and grammatical errors or typos.

According to Linda Pissott Reig, Esq., Co-Chair of the FDA/Biotech Group at Buchanan Ingersoll & Rooney, the ability to optimize the review of promotional content can directly translate into significant savings to a company's bottom line. "There is the 'intangible' benefit of freeing up highly skilled subject matter experts to focus on more meaningful endeavors. Companies' promotional efforts are more likely to thrive when in-person meeting time focuses on consensus building about novel claims rather than repeatedly fixing recurrent or obvious errors that should never have made it onto the promotional review committee agenda."

Reig shared her perspectives at a promotional review meeting where I moderated a panel that included Daniel Heider, Associate Director, Diabetes Payer Brand Marketing, Merck; Thomas Noto, Senior Director Regulatory Operations at Lexicon Pharmaceuticals; and Stacy Reese, Director of Regulatory Advertising and Promotions, Teva Pharmaceuticals.

Benchmark data on copy review inefficiencies points to inefficiencies in terms of lost time and money. The study showed that 25% of a professional's time engaged in copy review is lost to rewrites when those managing risk and those driving promotional messaging are not in sync. CCC has integrated these data into an ROI calculator which puts a fine point on the inefficiencies due to proofing and re-checking for errors and the submission of poor-quality content from untrained agencies or account team members that are new to the team or more junior in experience.

Take for example a mid-sized company that runs 8,000 promotional materials through its review process yearly; 20% of those materials are for new product launches, new claims, or digital promotion. Based on the calculation, the company could save nearly 15,000 hours of reviewer time by eliminating non-negotiable, non-compliant elements from the materials prior to submission. A smaller company with just 1,000 materials could save nearly 2,000 hours on rewrites.

The Value of Technology

There is a continuum of tech applications for more efficient MLR review that spans regulatory education, quality control, and basic editing. Technology delivers many benefits for the review of promotional content:

- **Consistency** (so minimum standards are systematically applied and verified for meeting quality standards).
- **Scalability** (which helps address the ebbs and flows in material volume).
- **Customization** (to address brand/franchise requirements).
- **Evolution** (where new concerns need to be evaluated across an entire portfolio).
- **Agility** (can be managed at a global or local level for rapid response).

High-Tech Quality Control

Fundamental government or corporate compliance requirements can be programmed into an algorithm and made accessible through web-based software for more systematic application.

There are several ways that sophisticated software computing increases productivity, including the following benefits:

- All content creators and reviewers have access to current approved messages for each brand and target audience for branded and unbranded campaigns
- There is a centralized catalog with approved messages that are always current
- It's easy to pinpoint how new phrases deviate from approved phrases
- A database is available that shows the history of approved and rejected phrases to avoid revisiting already approved content
- There is confirmation that the asset includes required disclaimers, annotations, references, etc.
- Approved promotional claims for brands can be sorted by various criteria for quick searches
- There is a process to compare core materials against derivative materials created from previously approved content.

Conclusion

Technology can make the review of promotional content more efficient by increasing the number of materials that are submission-ready and more quickly identifying problematic content. These strategies are critical as the volume and complexity of promotion increases and resources are stretched. No company can afford to waste time and money as a streamlined promotional review process is a competitive advantage.

Center for Communication Compliance (CCC)