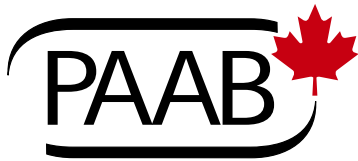


# Listening, Learning and Constantly Improving



The Pharmaceutical Advertising  
Advisory Board

## REVIEW

Ray Chepesiuk,  
Commissioner

Late in 2006 and early into 2007, the PAAB conducted an on-line survey of its customers to help the Commissioner assess customer service levels and perceived needs of the clients. This was the first major customer service survey done by the PAAB since 1992. We contracted Pharmahorizons to help in the creation of the survey and to act as an independent body to receive and compile the responses in a manner anonymous to the PAAB.

To reach the PAAB's audience, a regular mail invitation to take part in the survey was sent to 1,235 individuals from a database representing 378 corporate or agency presidents/CEOs, 81 stakeholders, such as industry associations and 776 pharmaceutical marketing professionals. While 1,235 individuals were sent the survey, it is reasonable to assume that a minimum of 10% of these addresses were dead-letter due to "churn," including career moves, business closures, holidays, or incorrect mail and e-mail addresses. It is a fair assumption that the survey had a real potential of a maximum of 1,111 respondents.

The invitations included a hotlink to the survey and a viral marketing tool called "Tell-a-Colleague" feature that enabled people to pass along the survey to fellow professionals. To accommodate the holiday season, the data collection period was set at 30 days, ending on January 10, 2007. In addition, several reminders about the survey were sent to survey recipients where e-mail addresses were available.

At the end of the data collection, 222 people answered the invitation to complete the survey. This represents a 20% response rate. In 1992, the survey was mailed to 1,200 people and garnered a 16.5% response rate.

### *So, who answered?*

About 50% of respondents identified themselves as working for a pharmaceutical company. Most worked in a marketing management role, as brand, product or promotional managers and coordinators. About half identified themselves as employed in an agency, new media or publisher role. Of those, 50% described themselves as account executives, directors, managers or coordinators. Rx&D employees accounted for 45% of respondents and 35% of respondents associated themselves with an advertising agency. About 60% indicated they had one to 10 years experience and 37% said they had > 10 years experience in this industry. Nine out of 10 respondents declared they had submitted materials to the PAAB in the last 12 months. Of those who had previously submitted materials to PAAB, 85% indicated that they have submitted materials between four and > 11 occasions. About three-quarters of respondents said they had communicated directly with the PAAB reviewers in the past 12 months.

### *And what did they say?*

- Many who declared an interaction with the PAAB had a positive experience. Three out of four of the 159 respondents who answered this question said the PAAB was "extremely helpful," "very helpful," or "helpful." Only 5% rated their interaction as "not helpful"

- Eight out of 10 respondents rated the PAAB reviewers “very accessible” or “accessible”
- Seven out of 10 respondents rated the PAAB administrative and support staff as “very good to excellent.” The subject of turnaround time generated considerable feedback in the open field comments and 80% of respondents said five days to 10 days was a reasonable turnaround time for a first review
- 25% said comments are added by the PAAB reviewers after the first review “often,” “most often,” or “always.” Almost half said the PAAB reviewers were “always,” or “most often” helpful when their submission was rejected and 40% rated reviewers as “only sometimes” helpful while 10% said reviewers were seldom helpful
- While > 60% said the feedback they get from the PAAB is “often,” “most often” or “always” consistent, the question generated a considerable number of comments about clarity and consistency in the reviewer responses
- Eight in 10 respondents rated the PAAB review process overall as “adequate-to-excellent” from a customer service perspective. Only 5% of those who replied said their customer experience was “poor.” This question also stimulated a fair number of comments
- When asked what they liked best about working with the PAAB, 40% of those who responded to the survey characterized the PAAB staff as “pleasant and punctual” and 15% said “when PAAB staff members say ‘No’ they always try helping me get to ‘Yes’”
- Nine out of 10 respondents rated the PAAB’s efforts to communicate its administrative procedures as “adequate” to “excellent.” Three out of four rated the PAAB code education program “adequate to excellent” with 40% rating it “very good”

*The survey has elicited helpful suggestions and thought provoking comments that should make the PAAB stop and look at itself.*

The top five issues identified by the survey respondents were:

1. Faster turnaround time
2. More consistency between reviewers and reviews
3. A need to keep the PAAB Code evolving with the marketplace
4. Greater clarity in the feedback they receive from the reviewers
5. More tips, techniques and examples of how to speed approval

These five topics may be addressed in a future article in *Canadian Pharmaceutical Marketing*, once we have had time to address them fully with an action plan.

The questions of “What could the PAAB do better?” was also included and some common threads of ideas and issues were chosen. I would like to address the specific comments that were selected.

- **“Make the interpretation of the PAAB Code less rigid, less subjective and more flexible”**  
It is unclear what this means in practice. If it means look the other way, due to the current political environment, this probably will not happen soon. It seems that everybody is bashing pharmaceutical company marketing practices. We may be fortunate to have a self-regulation system that works reasonably well. The US did not have a PAAB as a conscience and some people wish they did. If anything, Health Canada has been hearing from critics at their public forums to tighten up control on the pharma industry. While the PAAB has been a buffer to the extreme opinion of some critics, more stringent regulation may be inevitable given the industry’s current negative public image and the pressure being applied to government regulatory bodies. PAAB Code education workshops can help you learn why the PAAB exists and how it works and that may help change your opinion about how rigid the PAAB is in everyday terms.
- **“Evolve the PAAB Code faster to reflect a changing marketplace”**  
We have had four rounds of Code revision since I became commissioner in 1999. I thought people would be saying “the Code keeps changing too often.” The board members, not the staff, have the responsibility to evolve and approve the Code. This is not an “operational” issue for the Commissioner. The PAAB board will see the survey report
- **“Increase consistency of feedback”**  
We hear you. We work at this all of the time and if

you attended our workshops you would have received a copy of our Q&A process. Keep in mind we have hired six new reviewers in the past seven years. It takes a while to train them and for them to get enough experience to help them improve consistency. This comment came up several years ago and when we asked the Association of Medical Advertising Agencies to provide real examples, we received two cases. The point here is that we have to know what you perceive as “inconsistency” and then we can work on specifics to help us improve, or we can help to educate the customer about how the PAAB Code is applied. Help us out by providing real examples to address and we can learn from them

- **“Speed turnaround time, hire more staff”**

We are aware of staffing issues. Since 1999, the staff has gone from seven to 14 full-time employees (FTE). We have nine people who review submission files. We have not lost a fully trained reviewer since 2000. When I became commissioner, I was told not to expect increases in PAAB review volume because spending was shifting away from advertising. Last year, we had a large increase in review volume and the average per reviewer went up considerably, putting a lot of stress on the staff. We added two FTE reviewers and one administrative staff in 2006. We should be better off this year barring another increase in volume or the departure of trained staff. Since October 2006, we have been at 100% turnaround in 10 business days or less for the initial review. In the recent PAAB survey, 80% of people said they were happy with five to 10 days turnaround time

- **“Move to an electronic submission format”**

We are working on it with Klick Communications and should have something operational in July 2007

- **“Increase dialogue with the industry to get a better grasp of how the industry views the PAAB”**

I believe we have started this process with our latest survey. Throughout 2007, we will do small focus groups in Toronto and

Montreal, to help us identify specific things to improve. In addition, we will undertake quarterly mini e-mail delivered online surveys to regularly check the pulse of our customers

- **“Provide a variety of Code education courses, some for beginners, others for more advanced practitioners”**

There is only one PAAB Code and we apply it to all of the advertising we see. Therefore, I am not sure what this would entail and what would be accomplished. In my opinion, people need to acquire more experience working with the code. It takes our reviewers months of training before they are able to work somewhat independently and anywhere up to three years to be proficient and efficient.

In summary, I believe the aggregate results of the survey indicate that “it ain’t broke.” However, the survey has elicited helpful suggestions and thought-provoking comments that should make the PAAB stop and look at itself. We believe we can improve and the comments in the survey will help us do that.

I would like to thank all of the people who took the time to complete the survey. We take your comments seriously. I would also like to thank Mark Gregory and his staff at Pharmahorizons. I borrowed heavily from Mark’s report for this article. Also, I would like to thank the PAAB staff for their continuous effort to provide excellent customer service. We are always striving to improve. I appreciate the support from the PAAB Board Members who have always approved a budget to help strengthen staffing. **CPM**

*If you would like to know more about the PAAB Code revisions for July 2007, the PAAB e-FILES project or how to distinguish “advertising” from “CME,” please come to the PAAB workshops in April/May 2007. See our website [www.paab.ca](http://www.paab.ca) to get info. We have an excellent team at the PAAB. Please remember that you can always call them with your questions.*