

Using Social Media Platforms for PROMOTION AND COMMUNICATION

FDA GUIDANCE



Use of Limited Character Platforms (e.g., Twitter)

- » Messages posted on limited character platforms must follow promotional regulations.
- » Messages must be accurate; not-misleading; present risk information; and include a hyperlink to complete risk information.
- » If applicable, both the brand name and generic name of the product should appear in the message.
- » Abbreviations, punctuation, and symbols may be used to address space limitations.



Responding to Unsolicited Off-label Questions Received Through Electronic Means (e.g., forums, chat rooms, blogs)

- » The FDA recommends companies only respond to specific questions about a product or use.
- » When responding to a specific question, the responder should:
 - State he or she is a representative of the Company;
 - Advise that the question concerns an off-label use of the product; and
 - Provide detailed information of how to contact the Company to ask the question privately.
- » Once the question is asked privately, the response should address only the question asked, be non-promotional, be truthful and non-biased, and full product information should be provided.



Correcting Misinformation on Third-Party Internet or Social Media Platforms (e.g., Facebook)

- » FDA guidance on correcting third-party misinformation on an internet or social media platform applies only to user-generated content that is not created, sponsored, directed, or controlled by the manufacturer or seller of the product.
- » Responses to misinformation should be:
 - Relevant and responsive to the misinformation
 - Limited to, and tailored to the misinformation
 - Non-promotional in nature and tone
 - Accurate and consistent with FDA labeling
 - Supported by sufficient evidence
- » Responses should disclose that the person providing the corrective information is a representative of the Company.
- » Corrective information should be posted with the misinformation, or provided to the site author or administrator to be posted with the misinformation.
- » Companies should provide a link that goes directly to the FDA-approved labeling in order to address product risk.



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