



Emerging Technologies Used for Promotion: Regulatory and Legal Issues

M. Jason Brooke, Navigant Consulting, Inc.

John Vaughan, Outcome Health

Dale Cooke, President, PhillyCooke Consulting

Daniel Kracov, Arnold & Porter LLP

Landscape of Emerging Technologies

- Targeting abilities
- Data collection (Apple Watch, Fitbit, apps)
- Programmatic ad buying
- Growth of AI & Digital Therapeutics
- Voice interface

Targeting 101

- All advertising is targeted
- Traditional targeting abilities
 - Demographics (age, race, gender, etc.)
 - Psychographics (interests such as publication subscription)
 - Geography
- Modern targeting abilities
 - Facebook collects up to 52,000 data points on each person
 - You carry a tracking device in your pocket and give away valuable data every second it is turned on

The Challenge

“Half the money I spend on advertising is wasted; the trouble is I don't know which half.”

—John Wanamaker



Win-Win

- Advertising is information
- Effectively targeting advertising provides the audience (HCP, patient, caregiver) with information they need
- But modern targeting raises significant privacy concerns

Lookalikes

- Media buyers take anonymized data about scripts and patients
- Build a model of what the target audience looks like (overlying prescriber data, patient data, volunteered information, etc.)
- Buy advertising for similar audiences

Addressable Advertising

- Any television with a set top box (cable, Tivo, satellite) is connected to customizable ad networks
- Targeting based on lookalike modeling can identify specific devices (e.g., two TVs on a block will receive a commercial)

Programmatic Ad Buying

Traditional ad buys

- Determine the targeting & select media likely to reach the target

Programmatic ad buys

- Real-time auctions for ad space
- Literally no one knows where an ad will appear until it appears
- Primarily digital ad buying (includes connected TV)
2017: 78% of all non-healthcare digital ads were programmatic
2017: 37% of all healthcare ad buys

Digital Therapeutics

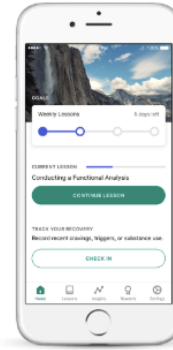
reSET[®]

reSET is a 90-day Prescription Digital Therapeutic (PDT) for Substance Use Disorder (SUD) intended to provide cognitive behavioral therapy (CBT), as an adjunct to a contingency management system, for patients 18 years of age and older who are currently enrolled in outpatient treatment under the supervision of a clinician.

An associated dashboard for clinicians and other health care providers can be used as part of treatment. The dashboard displays information about patients' use of reSET, including lessons completed, patient-reported substance use, patient-reported cravings and triggers, compliance rewards, and in-clinic data inputs such as urine drug screen results.

reSET-O[®]

reSET-O is an 84-day Prescription Digital Therapeutic (PDT) for Opioid Use Disorder (OUD) intended to increase retention of patients in outpatient treatment by providing cognitive behavioral therapy (CBT), as an adjunct to outpatient treatment that includes transmucosal buprenorphine and contingency management, for patients 18 years or older who are currently under the supervision of a clinician.



PATIENT-FACING APPLICATION



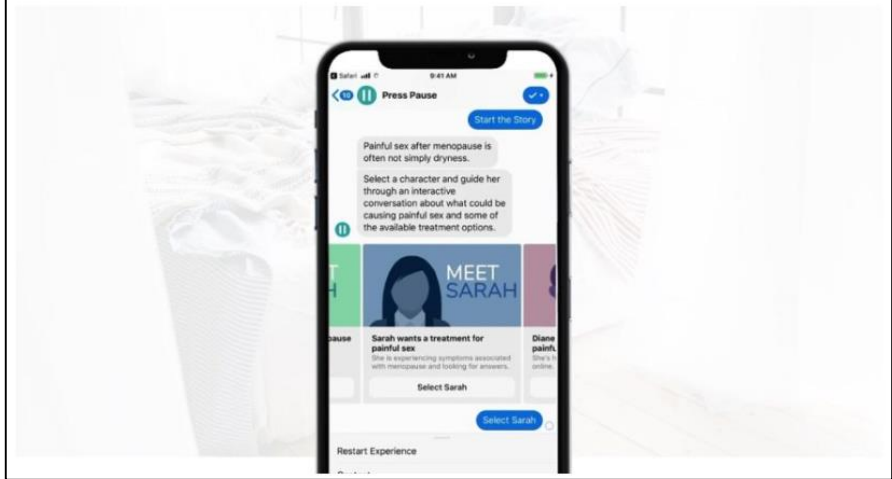
CLINICIAN-FACING APPLICATION

Artificial Intelligence

- AI-powered chatbots
- Mimic human conversations
- Chatbots can learn as they interact

Amag launches chatbot to ease conversations about sexual health

[Alison Kanski](#)



Voice Interface

- Alexa, Google Home, and others have achieved ubiquity
- Meeting FDA requirements is challenging (e.g., PI provision)
- Significant privacy concerns

