



May 14, 2001

4555 '01 MAY 16 P5:21

Bernard A. Schwetz  
Acting Principal Deputy Commissioner  
Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852

**RE: Docket No. 01N-0078: Agency Information Collection Activities; Proposed Collections; Comment Request; Assessment of Physician and Patient Attitudes Toward Direct-to-Consumer Promotion of Prescription Drugs.**

Dear Mr. Schwetz:

On behalf of Premier, Inc., a national strategic alliance of leading not-for-profit hospitals and health systems, we respectfully submit the following comments on the FDA's March 19, 2001 *Federal Register* notice, *Agency Information Collection Activities; Proposed Collections; Comment Request; Assessment of Physician and Patient Attitudes Toward Direct-to-Consumer Promotion of Prescription Drugs*.

Premier represents 210 owner health systems, the 954 hospitals and healthcare facilities they operate, and approximately 900 other hospital affiliates. Total annual purchasing volume for the alliance neared \$12 billion in 1999. Premier maintains major offices in Charlotte, NC; San Diego, CA; Chicago, IL; and Washington, DC.

**Physician survey.** As it is, the physician survey will yield a sufficient understanding of physicians' attitudes toward direct-to-consumer (DTC) advertising of prescription drugs. However, some additions or modifications to the survey might better capture other critical issues physicians have with such advertising. Suggested modifications are as follows:

- The intent of the survey appears to be the determination of the extent to which patients are asking physicians to prescribe (prescription) drugs based on advertisements they have been exposed to. This is an important determination to capture. However, a critical question not included in the survey is whether patients already receiving a specific drug therapy for a specific condition are asking their physicians to switch to the advertised drug. To determine the extent to which this is occurring, we suggest the addition of the following statement to *question 22* of the physician survey: "The patient was already receiving a prescribed drug, other than the advertised drug, for their condition." Similarly, we suggest the addition of the following question to *Section III, DTC Effects on Patient Outcomes*: "Has led patients to want to use the more expensive advertised prescription drug rather than a less expensive prescription drug." (Agree strongly; Agree somewhat; Neither agree nor disagree; Disagree somewhat; Disagree strongly.)
- A possible outcome of DTC advertising is that the patient-physician relationship is jeopardized by the physician's response to the patient's request for the advertised medication. While some questions in the survey address this theoretical effect, we suggest the addition of the following questions to further characterize this potential outcome:
  - Between *question 22* and *question 23*: "Not prescribing the advertised drug caused the patient to seek care from another physician." (yes/no)

*Premier, Inc. and related companies*

San Diego  
12225 El Camino Real  
San Diego, CA 92130  
858.481.2727 • Fax 858.481.8919

Chicago  
700 Commerce Drive  
Suite 100  
Oak Brook, IL 60523  
630.891.4100 • Fax 630.368.5310

Charlotte  
2320 Cascade Pointe Blvd. (28208)  
Suite 100  
PO Box 668800  
Charlotte, NC 28266-8800  
704.357.0022 • Fax 704.357.6611

*www.premierinc.com*

Washington, DC  
444 N. Capitol Street, NW  
Suite 625  
Washington, DC 20001-1511  
202.393.0860 • Fax 202.393.6499

01N-0078

C6

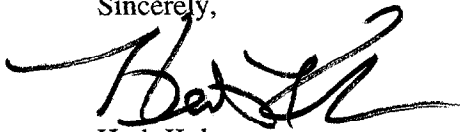
- Between *question 23* and *question 30*: "Not prescribing the advertised drug caused the patient to question my judgement." (Agree strongly; Agree somewhat; Neither agree nor disagree; Disagree somewhat; Disagree strongly.)
- Between *question 23* and *question 30*: "Not prescribing the advertised drug caused the patient to feel he/she was being mistreated." (Agree strongly; Agree somewhat; Neither agree nor disagree; Disagree somewhat; Disagree strongly.)

**Patient survey.** As it is, the patient survey will yield a sufficient understanding of patients' attitudes toward DTC advertising of prescription drugs. However, the addition of the following statements/questions would make the patient survey consistent with the revised physician survey, as suggested above.

- Between *question 29* and *question 30*: "If your physician did not prescribe the drug you asked for, did you go to another physician to get the advertised medication?" (yes/no)
- To the list of statements in *question 30*: "You were already taking a prescription drug for your condition."

Premier is appreciative of the opportunity to comment on this survey. For clarification or additional information, please contact Jeff Wojtynek, director, Clinical Pharmacy, at (630) 891-4716, or Margaret Reagan, director, Federal Affairs, at (202) 879-8003.

Sincerely,



Herb Kuhn  
Vice President  
Premier Advocacy



*Inc. and related companies*  
Capitol Street, NW

on, DC 20001-1511

Bernard A. Schwetz  
Acting Principal Deputy Commissioner  
Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane - Room 1061  
Rockville, MD 20852

301-827-3310