Behavioral Studies Supporting Rx-to-OTC Switches

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Agenda

- Predict/evaluate consumer behavior in the OTC environment
- Consider more information on likely OTC use
- Leverage a wider array of influences on OTC use
- Expand scientific foundations of OTC switch

The New OTC Paradigm

- OTC switches increasingly complex
 - From acute treatment of symptomatic conditions to
 - Support of preventive lifestyle changes
 - Chronic treatment of asymptomatic conditions
- Challenges ahead

Behavioral End-Points in OTC Switch

- Drug pharmacology typically well-understood
 - Considered safe & effective if used properly
- Questions in OTC switch are behavioral
- Critical question:

Will consumer behavior lead to safe and effective use?

Key Elements of OTC Simulation in Actual Use Studies

- No learned intermediary
- Sample consumers with interest in treatment
- Consumer makes decisions regarding drug purchase / use / repurchase / discontinuation

Data-gathering may cause "reactivity"

Strategies to Limit Reactivity: Reactivity vs. Insight

Strategy	Pros	Cons
Limit frequency of data collection contacts	Reduce potential influence	Reduce detail in data Maximize use of recall

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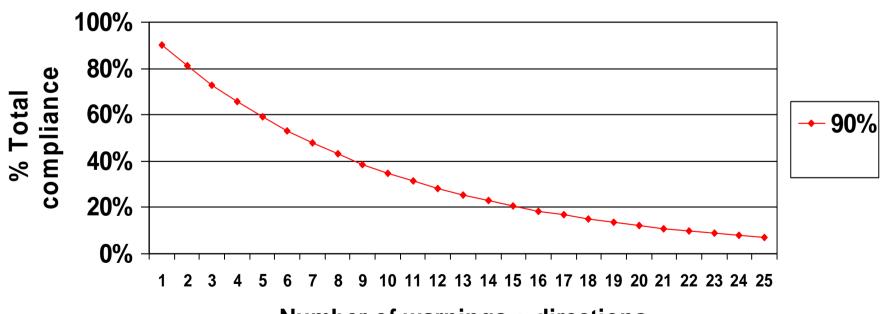
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Ask very open questions	Reduce information to subjects	Reduce detail in data Introduce ambiguity
Conduct Self-selection tests separate from AUS	Allow detailed debriefing of self-selection, without contaminating AUS	Additional research burden Do not observe purchase

Evaluating Study Outcomes: Focus on What's Critical to Risk / Benefit

- Focus on issues that matter most for consumer health
- Identify and agree on core issues for particular switch
- Design: Study & end-points to address key questions
- Evaluation: Focus on key end-points for risk

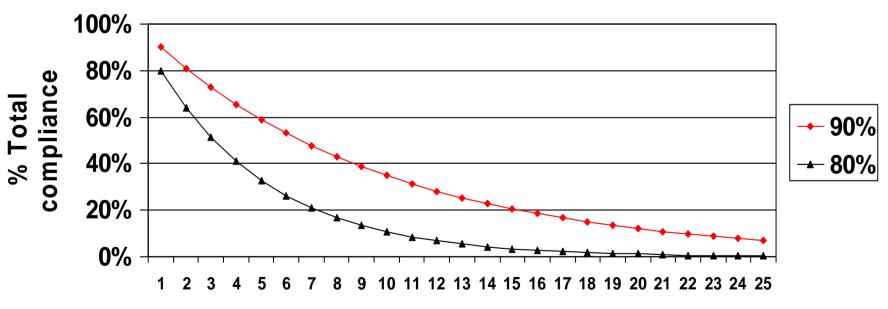
Total Compliance Measures Highly Sensitive to Number of Warnings + Directions

% Total Compliance, When 90% Comply with Each Element



Total Compliance Measures Highly Sensitive to Number of Warnings + Directions

% Total Compliance,
When 80-90% Comply with Each Element



Number of warnings + directions

Interpreting Outcomes: How Good is Good Enough?

- No single standard; weigh by risk
- Benchmarks:
 - Compliance with warnings in other domains
 - Behavior under Rx

Realistic Expectations of Warning Compliance

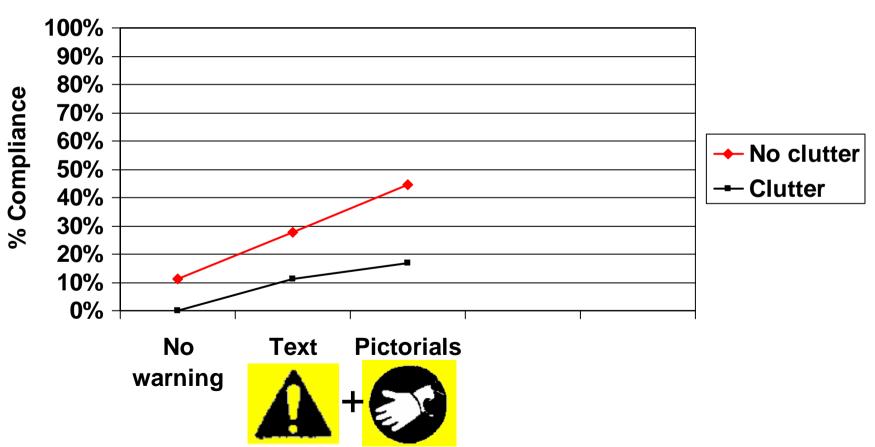
- Experimental example: Warning to wear gloves/mask
- Randomized to:
 - Range of different warnings
 - Cluttered vs. uncluttered setting
- Evaluate compliance



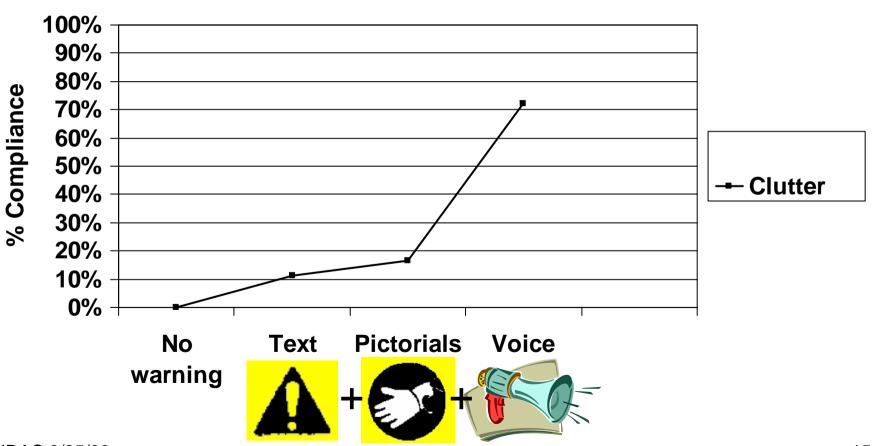
Wear rubber gloves and mask.



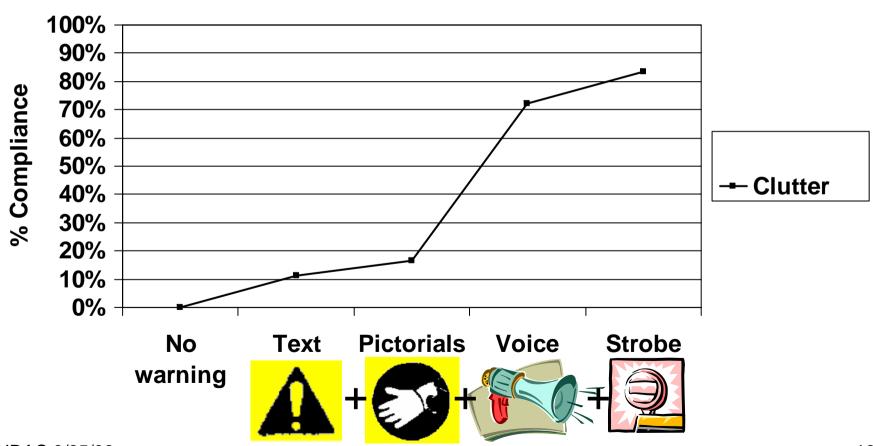
Compliance with Warning/Direction for Chemical Protection



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Compliance with Warning/Direction for Chemical Protection

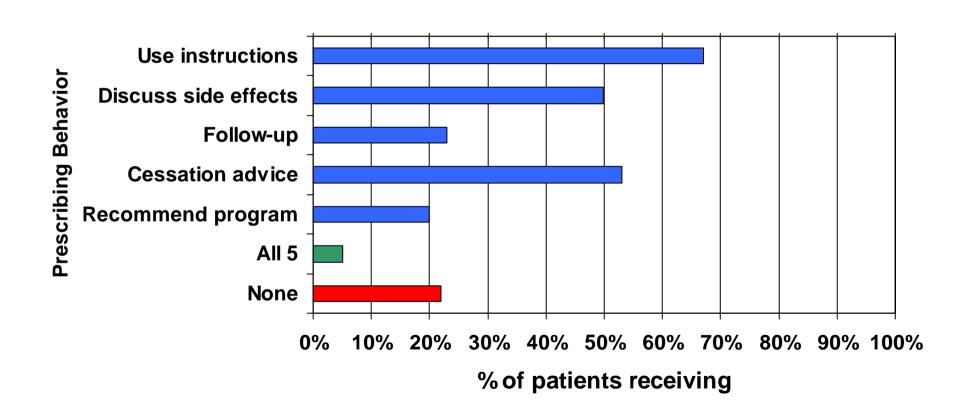


Context for OTC Switch: Rx Use Patterns

- Evaluate change: existing Rx context vs. OTC
- Real-world Rx use as benchmark
- Example:
 OTC Switch of Nicotine Replacement Therapy
 (NRT): Nicotine gum and patch

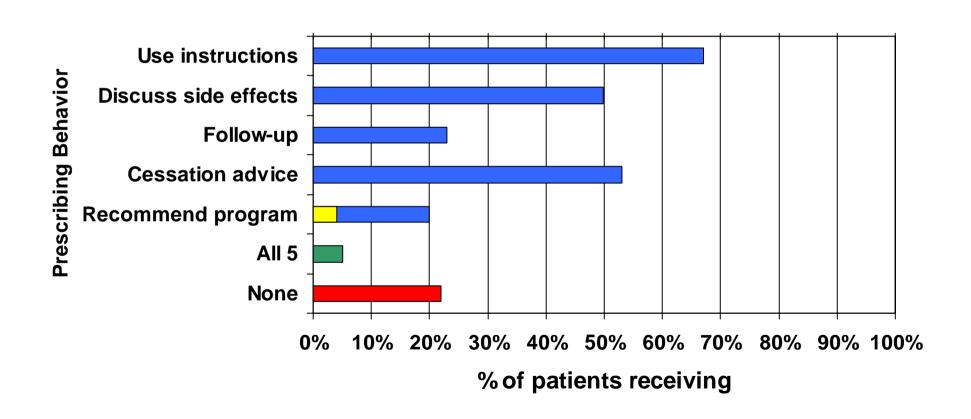
Prescribing Practices for NRT

(Pre-OTC Switch, Patient Reports)



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Expanding Sources of Information for Predicting OTC Behavior

- Actual patterns of Rx use
- Actual patterns of OTC (BTC) use ex-US
- Actual patterns of use of similar OTCs
- Post-marketing surveillance

Expand Sources of Influence on OTC Behavior

- Label is primary source of OTC information
- Expand other points of influence
 - In-pack materials: Print, CDs (still considered 'labeling')
 - Consumer educational materials/programs
 - Behavioral programs
 - Outreach to physicians and other influencers
- Risk Management Programs
 - Especially important for small at-risk populations

Evaluating Supplementary Programs

- Evaluation based on importance for safe OTC use
- Demonstrate the drug is OTC-able with the program
- Some programs can't be implemented/evaluated before approval

More Research Is Needed

e.g.,

- How do wording, format, order of warnings affect attention, priority, & compliance?
- How much does assessment lead to reactivity? How best to minimize reactivity?

Advancing the Scientific Foundations of OTC Switch

- Assess "State of the Science"
 - Analyze past switches
 - Review behavioral research relevant to OTC
- Collect new data on key OTC issues
- Develop behavioral science of OTC Switch

Questions?