

# emerging media brief

## How Facebook's New Comment Policy Impacts Your Pharma Facebook Page

As reported on the [Intouch Soul](#) blog in early April, Facebook has officially announced changes to their commenting policies on Facebook Pages. Facebook sales representatives sent emails with the official announcement to clients on May 17<sup>th</sup> explaining the changes. The email reads:

*I'm reaching out to inform you of a policy change regarding pharma Pages on Facebook that may affect one or more of your brand Pages.*

*As you know, Facebook Pages are a free product for organizations, public figures, businesses, and brands to express themselves and have an authentic, engaging, two-way dialog with people on Facebook. Previously, pharmaceutical brands could submit a request through their Facebook Sales*

*Representative to disable commenting on their Facebook Page. Starting today, Facebook will no longer allow admins of new pharma Pages to disable commenting on the content their Page shares with people on Facebook. Pages that currently have commenting disabled will no*

*"Although companies will retain the ability to be solely responsible for original content, with this policy change, Facebook is allowing any user to **comment** on that original content, or post."*

*longer have this entitlement after August 15th. Subject to Facebook's approval, branded Pages solely dedicated to a prescription drug may (continue to) have commenting functionality removed.*

*We think these policy changes support consistency for the Facebook Pages product and encourage an authentic dialogue between people and businesses on Facebook. However, we also understand that these changes may lead you to re-evaluate your strategy and presence on Facebook. We are committed to helping you during this transition.*

(reprinted with permission)

### **Background: What is Whitelisting?**

Prior to this announcement, Facebook allowed pharma clients to request certain functionality be disabled on Facebook Pages, most notably the ability for Page viewers to comment on Facebook Wall posts, photos and videos. This practice of disabling functionality was called “whitelisting.” Through whitelisting, pharma companies could better control the content that appeared on their Facebook Page by being the sole contributor of content. Many brands requested to be whitelisted due to regulatory concerns, and Facebook disabled functionality for those brands. However, as intimated in the email from Facebook, the practice of whitelisting is in direct contrast with the tenants of social media, which are to share content and allow open, two-way conversation.

As stated above, this policy change will no longer allow pharma companies to request whitelisting or be granted the ability to disable comments, unless the company’s Facebook Page is a branded Page “solely dedicated to a prescription drug.”

**Wall****Changing Possibilities in Hemophilia**

Get your team together for the Hemophilia Foundation of Greater Florida's (HFGF's) Spring Walk for Bleeding Disorders. All proceeds go toward the programs and services HFGF provides to the local community. We hope to see you at Al Lopez Park in Tampa, FL, on May 14, 2011! Visit [hemophiliaflorida.org](http://hemophiliaflorida.org) for more information.

May 12 at 12:54pm

*Whitelisted NovoNordisk Changing Possibilities in Hemophilia post with Comment link/functionality disabled. Although currently whitelisted, this Page may not qualify after August 15<sup>th</sup>.*

**Pharma's Facebook Challenge**

With this policy change, pharma will have less control over the conversation on their Facebook Page's native Wall, Video and Photo sections. However, companies will still be able to control the creation of original content, or posts. This is a very important distinction. Facebook will continue to allow the Page administrator, in most cases this is a brand manager or member of their staff, to control the copy, links, pictures, videos and information that appears on a company's or brand's Page.


In the Manage Permissions section of any Facebook Page, administrators will be able to retain sole original content creation ability by leaving "unchecked" the Posting Ability boxes that read, "Users can write or post content on the wall," "Users can add photos" and "Users can add videos" without checkmarks (see below). The image below shows the Posting Ability settings for a Facebook Page that retains sole responsibility for original content creation, or posts.

**Wall Tab Shows:**  [?]  **Expand comments on stories**

**Default Landing Tab:**


**Posting Ability:**  **Users can write or post content on the wall**  
 **Users can add photos**  
 **Users can add videos**

Although companies will retain the ability to be solely responsible for original content, with this policy change, Facebook is allowing any user to *comment* on that original content, or post. Users create comments when they click on the Comment link underneath a post, photo or video. Users can also Like or Share a post by simply clicking the appropriate links. The example below shows a post with comments enabled.



**Boehringer Ingelheim**

WHO wins, YOU decide! Click on the album and vote for your favourite 'More Health' inspired photos. The Photos have until 31st May to garner as many 'likes' as possible. The photo with the most 'likes' wins. It's that simple!




**The Shortlist – VOTE NOW to decide who WINS!**

Let the Voting begin! You decide the winner of the More Health Photo Competition  
 By: **Boehringer Ingelheim**  
 Photos: 50


📅
Monday at 8:57am · Like · Comment · Share

👍 11 people like this.




**Ram Goel** **Boehringer Ingelheim** Why my entry didn't get selected..Please tell..?

Yesterday at 1:12am · Like



**Trudi Walsh** Because its fixed – ricky solitaria works for the company, notice he has the most likes atm

4 hours ago · Like



**Boehringer Ingelheim** Hi Trudi and Ram, We had over 800 photos to judge and all the photos that were shortlisted were judged by us to be of a high quality. We were happy with all them and consider all them to be 'winners' in their own right. And also the selection was based only on the photo, and not the person submitting it.

3 hours ago · Like

Write a comment...

Comments like the ones in the example above are generally benign and a great opportunity for companies and brands to have meaningful conversations with customers or provide valuable customer service. Looking at the example above, Boehringer Ingelheim addresses a situation where two customers are upset with the results of a simple contest. The administrator of the Page was able to quickly diffuse a conversation that had the potential of becoming very negative.

However, this example also illustrates one of the main concerns of pharma companies when using social media. The concern is that users will attack or harass the company, talk about off-label uses and side effects, report adverse events or provide misinformation via their Facebook Page. These are all valid concerns. And with commenting enabled on all Facebook Pages, users could engage in this activity although it is highly unlikely. [A study conducted by Nielsen](#) found that only one in 500 posts on the Yahoo! Health discussion boards met the full criteria for adverse event reporting.

This leads us to believe that negative conversations, or conversations that may be more difficult to handle, do not happen very often and are easily manageable in the social media space. This does not mean that the concern is not valid. It is. Crisis management and appropriate comment moderation should be a major part of any social media engagement plan.

## **Solutions: What CAN Pharma Do On Facebook?**

The good news is, pharma can still create and maintain Facebook Pages, even with the new policy. There are many options to properly manage a Facebook presence for pharma companies.

### **Option 1: Moderation Applications**

The new policy only applies to **native** Facebook functionality. There are many third-party developers who have created alternatives to this functionality that can be used in place of the native Facebook wall. For example, Intouch Solutions offers an application, PharmaWall, which can be used as an alternate Facebook Wall. The application allows users to comment on posts. But instead of instantly adding the comment to the post, PharmaWall puts the post in a queue for review by the

administrator. An email notification is sent to the administrator when a comment is submitted and they can then route the comment through the appropriate approval process. We recommend and believe PharmaWall is one of the safest solutions for our pharma clients who currently own or are interested in controlling the content on a Facebook Page.

### **Option 2: 24/7 Monitoring and Moderation**

If your company is interested in using the native Facebook functionality for the Wall, photos and videos and is prepared to have open comments, 24/7 monitoring and moderation is a necessary component of your engagement and communications strategy. This option requires a bit more allocation of resources, but with the appropriate people monitoring your Facebook properties and managing your reputation it is extremely effective. In our experience, it is best to set up comprehensive workflows and triage plans to ensure your moderation team is prepared for any comment that is submitted. It is also imperative to make sure your team is trained regarding adverse event reporting and off-label discussion. Finally, the team must have a dedicated contact person to whom comments that do not fit any of the approved scenarios can be routed.

This may sound like a lot of work. It definitely is. But if you are working with an experienced partner, they can help you navigate many of the situations you will encounter. Many agencies, like Intouch, have vast experience in Facebook monitoring and moderation and can help you get a team up and running quickly.

### **Option 3: Create Branded Facebook Pages**

As described in Facebook's new policy, pharma Pages that are "solely dedicated to a prescription drug may (continue to) have commenting functionality removed." We know that this will be determined on a case-by-case basis. But, creating branded Pages to promote an individual drug will be considered for whitelisting moving forward.

This may not be the best option for certain brands and will definitely be a bigger challenge for black box drugs. But – somewhat ironically – branding your Facebook Page will provide more control over the content, and you can still benefit from the exposure of your product to the segment of your audience that uses Facebook.

### **Other Options**

There are a couple of other options for pharma to utilize Facebook Pages. Companies and brands could choose to forego a branded presence and allow select employees to speak on behalf of the brand on Facebook. This would simply require the employee to have a Facebook profile that they control, and the willingness to look for conversations happening on the social network about their brand. Many PR and communications people have already been trained to speak on behalf of their companies, and most of them have a basic understanding of Facebook. Whether it is correcting misinformation or adding value through an “insider’s view” to an on-going discussion, Facebook users tend to appreciate a more “human” approach to engagement by brands.

Another option is Facebook ads. Pharma brands that are not quite prepared for engagement can still garner some brand awareness within Facebook using ads. Facebook has gone to great lengths over the last year to enhance targeting on their ad network. They have also introduced Facebook Sponsored Stories, which allows users to see places their friends have checked-in at and Pages they have “liked” in connection with a business or organization.

### **In Conclusion**

At Facebook things change quickly. Their fast-and-furious pace tends to cause a lot of confusion for pharma clients. At Intouch, we work hard to closely monitor and understand these changes, and to help our clients adapt as needed. With all social media marketing initiatives, it’s best to take a calm approach, assess the situation and decide what is in the best interest of your company and customers. This will not be the last time Facebook makes a policy change that will impact the pharma industry. As marketers, we all need to be prepared for these changes to ensure our

initiatives result in better reputations for our brands, stronger customer relations and more positive outcomes for our businesses.

## Questions or Comments

If you are thinking about utilizing Facebook to engage with your customers, if you have a current page you're worried about, or if you have any questions regarding the new comment policy or PharmaWall, please contact Jim Dayton or Wendy Blackburn at Intouch:

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