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POV: OPEN GRAPH TAGS: THE HIDDEN
CODE THAT ENABLES COMPLIANT SOCIAL
SHARING FOR PHARMA

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OPEN GRAPH TAGS: THE HIDDEN CODE THAT ENABLES COMPLIANT SOCIAL SHARING FOR PHARMA

EXECUTIVE SUMMARY

When many people think of metadata, their first thought is of organic metadata — the code that gets inserted into the header of a website, invisible to typical users, to enhance search results. However, metadata (data about data) is a term used to describe a variety of content. One type of metadata is the Open Graph tag. Open Graph tags allow website owners to control information — such as text and images — that appears when a website link is shared to social platforms.

In highly regulated industries like pharma, being able to control this content is important. Novartis received an **FDA letter in 2010 for several TASIGNA® websites** in part because they allowed non-compliant content to be shared. The details of the letter indicate that the Facebook sharing feature of the social widget on TASIGNA's U.S. website generated communications that omitted risk information, broadened the approved indication, made unsubstantiated superiority claims and overstated efficacy. The letter also pointed out that, while the website itself was submitted to the FDA per regulations, the shared content was not submitted prior to use.

There are distinct differences between organic metadata and Open Graph tags, including their compliance standards, and understanding these differences can help marketers avoid making metadata mistakes. This POV will cover what Open Graph tags are, why they are necessary for all websites, and what we recommend pharma marketers do based on FDA draft guidance.

BACKGROUND

In 2010, Facebook introduced a standard metadata protocol that gave content owners some control over how content is shared. This protocol is known as the Open Graph and defines

several fields that content developers can craft tags for, including page title, description and image.

Facebook established Open Graph to help content owners control sharing on Facebook, but many other social platforms (including LinkedIn, Pinterest and Google+) have also adopted these tags for content shared on their networks.

Open Graph tags are utilized when a user clicks on a sharing button on a webpage or when they copy/paste a link from a website into a post on a social platform. The information from the Open Graph tags populates the fields for title, description and image.

A post shared on Facebook (right), using Open Graph tags for the image, title, description and URL from code embedded on the original post (left).

Implementing Open Graph tags is optional. However, if Open Graph tags haven't been included, social platforms will use other content or metadata found on the page to describe that page's content. The content creator may have meticulously crafted every piece of content on the page, but without Open Graph tags, they have no control over how the social network delivers that page to users when shared. Since social sharing cannot be turned off by websites, the absence of Open Graph tags means pages owners have little to no control over how social platforms will describe page content.

… Without Open Graph tags, brands have no control over how a social network delivers a page to users when shared.

DIFFERENCE FROM ORGANIC METADATA

The biggest difference between organic metadata and Open Graph tags is function. Organic metadata tags are written to improve indexing and gain visibility to search engines; Open Graph tags are written to improve context for shares on social platforms.

Additionally, though the contents of Open Graph tags and metadata tags are completely controlled by the developer, the outputs are not. Organic metadata tags are at the mercy of the platform using them, so Google can display any part of a page or its tags in search results for the page. Open Graph tags are more consistently used by social platforms. Instead of using any part of the tags, social networks will truncate a field if there are too many characters.

For example, for a website that has the same 400-character description in organic metadata and Open Graph tags, Google may use any combination of those 400 characters in search results (or none at all), while Facebook will use as many characters as possible in shared content, truncating it as the post format allows.

Below are a few examples of how Open Graph tags are shown when a user shares a link on social platforms other than Facebook.

Pinterest

Google+

Twitter does not use Open Graph tags in the same way many other networks do, but a non-compliant message will never populate in previews since Twitter has its own metadata schema called **Twitter Cards**. Websites without Cards will not have link previews prepopulated in tweets.

IMPLICATIONS FOR PHARMA

Pharma brands are aware that including a name and indication without important safety information is not compliant in the eyes of the FDA and could warrant an enforcement letter. While brands cannot control the messages that users include alongside link previews, the FDA has acknowledged that brands are not responsible for non-compliant **user-generated content**. However, knowingly or unknowingly prompting non-compliant messages for users to share in link previews on these platforms is not advised, so it's important to understand how to make these pre-populated messages compliant.

Developers and website owners have no control over how organic metadata tags are used to populate search results. However, developers of Open Graph tags have more control over how those tags are shared to social platforms, which means there are different compliance standards and developers are more responsible for the message within those tags.

USAGE ON DISEASE AWARENESS WEBSITES
As long as disease awareness websites don't include branded or otherwise non-compliant content in their Open Graph tags, there are no compliance concerns.

USAGE ON BRANDED WEBSITES
For branded sites, there are more restrictions about how Open Graph tags can be implemented. There are three possible ways to develop tags: with full product promotion, with only reminder-formatted communication and with unbranded communication.

Full Product Promotion
Intouch believes that a modified version of the FDA's draft guidance on **character-constrained communication** should be applied for Open Graph tag creation. The FDA guidance allows for a product's benefit in character-constrained messaging, so long as it includes all of the following six elements.

1. Brand name
2. Generic name and/or active ingredients
3. Non-misleading indication statement
4. All contraindications (other than mere hypersensitivity to the active ingredients) and life-threatening risks
5. Abbreviated risk statement
6. Link to full risk information (and additional elements required of a product promotion, such as dosage form and quantitative ingredient information)

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Any combination of the standard title, description, image and URL can be used to include these elements. Brands that are not able to include all six elements above within the space allotted for Open Graph tags should reconsider using full product promotion in those fields. Not all brands will be able to include full product promotion in these tags.

Reminder Ads
Open Graph tags that only include a product's name, but not any information about the use or indication of a product, are permitted. This format is similar to reminder ads, which only require the brand and generic name.

A simple example of this format would be, "Learn more about how [treatment] can help."

Unbranded (with use of URL shortener that masks the domain)
Another alternative to full product promotion is using unbranded messaging on a branded site. This format does not qualify as product promotion since the treatment name or defining characteristics are not mentioned. These messages typically include a link to a page that contains the full product promotion.

It's important to note that a URL shortener like **ssshare.it** is needed when employing this technique. The mention of BRANDNAME.com in the URL of a shared message negates the unbranded messaging and converts it into full product promotion. Obscuring the URL is the only way to ensure those four fields (name, description, image, URL) do not contain branded messages.

RECOMMENDATIONS

With this information in mind, pharma marketers should take the following steps to ensure they are leveraging Open Graph tags effectively and compliantly.

+ **Use Open Graph tags.** Don't let the third-party social platforms choose the content that populates in previews. Use Open Graph to communicate clearly and with more control.
+ **Create and adhere to standards.** Platforms change and have different specifications on what they use for social sharing, so develop and publish your own consistent standards for the tags (e.g., character limits, image sizes). Just as websites cannot be tested for every display configuration for mobile devices due to the sheer number of devices, the

same is true for testing the way link previews display. Test the standards you create on the most prominent platform to be sure it consistently displays compliant information.

+ **Audit existing websites.** Intouch recommends auditing existing websites to ensure that sites *without* Open Graph tags get them, sites *with* Open Graph tags were not copied from organic metadata, and all tags are compliant.

+ **Submit the tags for review.** Submit the Open Graph tags for review the same way metadata tags are submitted for medical, legal and regulatory review. The FDA's 2010 enforcement activity on shareable content (i.e., TASIGNA's letter) cited failure to submit content under cover of Form 2253. If the site's content needs to be submitted under cover of Form 2253, the Open Graph tags need to be submitted, too.

+ **Encourage sharing.** When Open Graph tags are implemented and tested, brands should take full advantage of sharing compliant messages. Users sharing site content can increase the impressions on social platforms, driving other users to the site.

The bottom line: Open Graph tags give brands more control over how their own content is shared to social media platforms, without stifling the voice of the consumer. Any technology that enables compliant communication is always welcome to pharma.

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