

PAAB Tags and CEI 2024

QUARTERLY REVIEW

A Quarterly Review of the eFiles Customer Experience Index (CEI)

The CEI Survey launched on February 13, 2023. This review of the CEI data accounts for the data captured between **July 1 – September 30, 2024**.

271

Completed Surveys

July 1 to September 30, 2024.

Averages of the CEI question survey results by question:

1. Staff connected with this eFile (e.g., file coordinators, reviewers, senior reviewers, etc.) were helpful and responsive

4.6/5

Indicating an average response between “Agree” and “Strongly Agree”

2. Comments and suggestions in response letters, calls and messenger were clear and actionable.

4.5/5

Indicating an average response between “Agree” and “Strongly Agree”

3. I felt the review was:

1. Highly inconsistent
2. Somewhat inconsistent
3. Somewhat consistent
4. Highly consistent
5. I don't know

3.8/4*

Indicating an average response between “Somewhat consistent” and “Highly Consistent”

*This average rating is calculated from Responses 1-4 as including ratings of 5 (or “I don't know”) would have skewed the average upward. There were 4 ratings of “I don't know” in this data set.

4. Please provide any other feedback specific to this file:
[optional open text field]

See feedback themes below.

5. Please rate your overall experience with this particular review

8.8/10

- 1 – highly negative experience
10 – highly positive experience

Indicating a positive average overall experience.

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Key Themes and Actions Taken from Open-text Feedback:

1. **Appreciation for quick ARO reviews, PAABs new services such as minor updates, and helpful interactions with reviewers (n=14).** A significant number of positive responses and comments persisted. Comment highlighted positive experiences with the review process, reviewer interactions, eFiles upgrades, and policy updates. This is extremely helpful for providing positive feedback to reviewers about what clients are finding particularly helpful.

Action Taken: Reviewers were provided a summary of key features that resulted in a positive experience for clients with the goal of reinforcing these behaviours.

2. **Clear and Actionable Feedback (n=11).** Some clients reported that it would be helpful if comments from reviewers were more specific and actionable (n=5). In one instance a reviewer did not provide specific suggestions for how French translation could be adapted to better match English copy. In the other instances, the comment from the reviewer was felt to be vague resulting in additional rounds of comments to clarify the initial request. Other clients reported receiving clear and actionable feedback (n=6).

Action Taken: Reviewers have been reminded to provide as much specificity as possible when commenting and to provide examples and suggestions when possible and where appropriate.

3. **Changes required to previously approved content (n=3).** In one instance, a reference was questioned upon renewal that had been previously accepted. This was due to the claim being modified in the new APS and placed within a different context. This resulted in the claim requiring different substantiation than the prior claim. In another instance, an oversight was made in a previous version of a data presentation that was required to be corrected. In the third instance, the market had changed since the previous copy was accepted and the market entry of a new product changed the acceptability of the prior claim.

Action Taken: Reviewers have been reminded to provide clear and detailed rationales when previously accepted copy is questioned to avoid extra rounds of review for clarification purposes.

4. **Variability in interpretation of patient visuals and visuals that may imply quality of life (QOL) (n=1).**

Action Taken: Visuals and creative are inherently subjective and we understand how it can be perceived as inconsistent when two visuals that are similar on the surface generate different comments during the review. Over the past year, the Creative Committee has been diligently working toward providing a document that outlines a refined approach

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to reviewing creative and outlining considerations for agencies when undertaking creative development. We are hopeful that this document will provide guardrails when creating and interpreting creatives along with alignment on language when discussing creatives. We look forward to greater alignment with industry as it relates to creative development and review.

Key Takeaways:

- Survey Completion Rate is 20.6%, with this data capturing 271 responses out of 1317 surveys sent. Data should be interpreted with this in mind, as this is a relatively low sample size.
- Ratings for all questions, on average, have been positive. This data set is reflective of the complete quarter. Results have remained generally positive and consistent with the data from all quarters of 2023.

Have your voice heard! Help us continually improve by completing your CEI surveys. You can find them in the "My CEI Surveys" Tab in the top navigation bar in eFiles. This helps us identify trends and implement quality improvement initiatives both internally and externally.

We continue to encourage you to be as specific as possible when providing feedback in order to help us best understand your experience with PAAB and create a meaningful action-plan to improve or disseminate best practices. Thank you for your continued participation in the CEI surveys!

Confidence in confidentiality

As a reminder, client tags trigger internal audits for validation by PAAB's Director of Pre-clearance Services, Yin Man. Any tags pertaining to Yin are validated by the Commissioner and removed from the report provided to Yin. No Reviewer or Senior Reviewer is EVER aware of tags generated by clients. The CEI Surveys follow the same processing flow. You can be confident in the confidentiality of the tagging system and CEI Surveys. For additional reassurance, the tagging system, tag assessments, and documented actions taken will periodically be reviewed by an external auditor.

If you'd like to learn more about the client tagging system, check out the [Client Tagging System Advisory](#). You'll also find links to useful videos on [tagging a review](#) and [tagging phone calls](#).

If you'd like to learn more about CEIs, see [Customer Experience Index](#).

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A Quarterly Review of the eFiles Tag Report

Total number of submissions*

QUARTER 1	QUARTER 2	QUARTER 3	QUARTER 4
2304	2467	2147	

*Refers to unique eFiles. This number does not account for iterations within each file.

Total number of client tags (prior to validation)

QUARTER 1	QUARTER 2	QUARTER 3	QUARTER 4
13	14	19	

Tag submitting company and manufacturer distribution

QUARTER 1	QUARTER 2	QUARTER 3	QUARTER 4
3 & 1	7 & 0	6 & 1	

Therapeutic area distribution

QUARTER 1	QUARTER 2	QUARTER 3	QUARTER 4
4 <i>Immunology</i>	5 <i>Biologic/ Immunomodulator</i>	6 <i>Pulmonary</i>	
2 <i>Neurology</i>	4 <i>Gastrointestinal</i>	4 <i>Infection & Infestation</i>	
2 <i>Vaccine</i>	2 <i>Vaccine</i>	3 <i>Immunology</i>	
2 <i>Dermatology</i>	2 <i>Oncology</i>	2 <i>Obstetrics & Gynaecology</i>	
1 <i>Gastrointestinal</i>	1 <i>Women's Health</i>	1 <i>Psychiatric</i>	
1 <i>Endocrine and Metabolic</i>	1 <i>Other</i>	1 <i>Endocrine & Metabolic</i>	
1 <i>Cardiovascular</i>		1 <i>Oncology</i>	

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1 *Dermatology*

Total number of tags deemed valid following internal review

QUARTER 1	QUARTER 2	QUARTER 3	QUARTER 4
4	5	7	

Validated tag breakdown

QUARTER 1	QUARTER 2	QUARTER 3	QUARTER 4
2 <i>New issue raised late in the review</i>	3 <i>Particularly helpful comment</i>	2 <i>New issue raised late in the review</i>	
1 <i>Inconsistencies with historic approvals for the same brand</i>	1 <i>Consider changing the code guidance</i>	2 <i>Particularly helpful comment</i>	
1 <i>Particularly helpful comment</i>	1 <i>Inconsistent with code guidance</i>	1 <i>Inconsistencies with historic approvals for the same brand</i>	
		1 <i>Requested revision was unclear</i>	

Q3 PAAB Action Taken:

Reviewers have been reminded to include a comment or placeholder note on visuals in their responses. This notifies clients that final visuals are required and that additional comments may follow once the copy is revised. This approach helps clients plan effectively and encourages them to consider how the copy may influence the visual context during revisions.

At the last reviewer meeting, reviewers were reminded of the importance of providing precise rationale for requested changes with increased importance being placed on issues that have persisted for more than one round.

Reasons for not validating a tag:

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In two instances, there were disagreements regarding formulary presentations. The reviewers directed clients to the relevant guidance documents available on the PAAB website. Please note that formulary presentation requirements are enforced at the request of the formulary bodies, allowing formulary claims to be maintained within advertising.

In one instance, the tag "Late correspondence impacted client" was applied, although all responses were returned on or before their due dates. While a late-stage comment was made (valid tag), the reviewer worked promptly to ensure responses were delivered on or ahead of time, minimizing any potential impact on timelines.

When selecting tags, we kindly encourage clients to carefully choose those that accurately reflect the interaction, as this supports a higher ratio of valid tags. Tags and their descriptions can be found [here](#).

Is there more information you would like to know and see in the next quarterly update? Let us know on the [Forum](#).