

## PUBLIC AFFAIRS STRATEGY MEMO

TO: L.D. King, Jennifer Goodrum  
*International Academy of Compounding Pharmacists*

George Malmberg  
Chair, Public Affairs Committee

FROM: Bob Chlopak, Josh Wenderoff, Tammy Gordon  
*Chlopak, Leonard, Schechter & Associates*

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SUBJ: Priority Objectives for "Rx for Success" Public Affairs Campaign

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Over the course of the last several weeks, CLS has developed a deeper understanding of the issues facing compounding pharmacists and the players shaping those issues. We have developed a core set of messages that we and our members can use to correct the misperceptions about the practice of compounding and the regulations that govern it. We have helped IACP respond to several challenges—from the absence of representation at ACVIM's last conference to the new Compounding Compliance Form being used by the AAEP. We are also in the process of working with IACP's lawyers to draft a response to CHASM's Citizen Petition. In addition, we have identified a set of potential allies and have initiated an effort to mobilize them to publicly support the profession. And now that we have achieved a level of comfort with Convio's proposal, we will begin revamping IACP's website to facilitate fundraising and grassroots mobilization.

Following our initial discussions, we have outlined a set of objectives and developed a long-term strategy to accomplish them. We believe all of these objectives and strategies are worth pursuing, but have prioritize from levels one to three to be pursued over the next six to 12 months.

Of course, in addition to these efforts, CLS will be available to address other issues as they arise—for example, addressing positions that other organizations take that affect compounding pharmacists, correcting misinformation in news stories, dealing with issues related to the pending lawsuits, etc.

### **Objectives:**

- Maintain states' ultimate authority over compounding
- Build and strengthen alliances
- Strengthen members' support of IACP
- Improve public perception of compounding

## Strategy:

### Priority Level One

- **Develop greater support on Capitol Hill.** If we win Midland, the FDA will go to the Hill to reassert its authority through legislation. If we lose, we will likely pursue relief through legislation. Either way, we'll need support on the Hill – and better to generate it sooner than later. However, asking Members for support generally without a specific request is difficult. And we would hesitate to use the lawsuits as the stated motive behind our visits. Instead, we recommend developing an agenda for the Hill that would give us a specific ask, while also allowing us to demonstrate the value of the profession. Asking for federal funding for an accreditation program or reviving the old Brewster bill reiterating that compounding falls under state authority are two options to consider. As we settle on an ask, we will:
  - Prioritize a list of key Members and staffers – from friends whose support we can strengthen, to neutral Members whose support we can build, to enemies whose opposition we can temper
  - Develop a briefing deck and conduct Hill visits, potentially with pharmacists from Members' districts
  - Generate letters from constituents as part of our grassroots campaign (see Member Engagement section below)
  - Pursue and publicize positive community stories on compounding pharmacists in key Members' districts
  - Prepare “Compounding in Your District” fact sheets that illustrate the presence and positive impact that compounding pharmacists have in key Members' districts
  
- **Strengthen our base of stakeholder support.** Our entire campaign is founded on demonstrating the value of compounding. As a result, we aim to identify, educate and mobilize those stakeholders that benefit from compounding – the healthcare providers (pharmacists, healthcare advocacy groups, physicians and veterinarians) and, on the other hand, the recipients of healthcare services (patients, pet owners, breeders, trainers, etc.) and their advocates. To do this, we will:
  - Work with Convio to build a Web-enabled grassroots infrastructure to facilitate outreach to and mobilization of members and other allies (see Member Engagement section below)
  - Create “Advocates for Customized Care” affiliate organizations for physicians and patients, veterinarians and pet owners, etc.
    - Becomes something IACP can reference to demonstrate tangible support
    - Helps formalize relationship between IACP and allies
    - Facilitates mobilization in the form of letters to Members, letters to editors, etc.
  - Mobilize allied individuals and organizations (publicizing efforts when appropriate)

- Write letters to HHS in support of compounding
    - Provide commentary for news stories
    - Submit amicus briefs
    - Sign op-eds
    - Write letters to insurers to alter their reimbursement policies
    - Pressure organizations to halt anti-compounding messaging and restrictions at conferences and trade shows
  - Identify and educate potential allies
    - Develop a PowerPoint deck for briefings
    - Schedule and conduct a series of briefings with key stakeholders
- **Create a rapid response/opposition effort.** As we anticipate more criticism from academics and organizations, we should have in place a system to respond quickly in a way that both corrects the misinformation and deters our detractors from making outrageous claims. And while we intend to control communications through IACP, we still want to provide IACP members with the materials and tools they need to respond to criticisms they face and in a way that is consistent with what we are saying.
  - Establish the counterpunch website (tentatively [compoundingfacts.org](http://compoundingfacts.org) – will also purchase .com and .net)
    - Design mechanism for monitoring statements of detractors
    - Begin developing copy and site structure
  - Complete a set of materials available on the web to ensure the industry speaks with a unified voice
    - Key messages
    - Issue book (what exactly we make public TBD)
    - Q&A
  - Bypass leadership of key organizations (e.g. AAEP, AVMA, etc.) to communicate directly with individual members about their organizations' policies
  - Boost presence, neutralize opposition at key conferences
    - Flesh out and monitor conference calendar to anticipate and address attacks
    - Arm friendly audience members with appropriate questions and facts to rebut opposition
    - Build alliances with experts (ideally pharmacists or attorneys) who can speak at conferences in support of compounding
- **Engage members.** Finally, we need to ensure that our members are fully engaged in our campaign. First, IACP's work and successes need to be communicated to its members. We want to make sure that members that are contributing funds to the campaign know their donations are being used productively. We also want to compel the other members that their contributions would be put to good use. At the same time, we want to fully leverage the members' passion and expertise.
  - To communicate IACP's efforts to its members, we will:
    - Summarize accomplishments to date

- Create public affairs section of e-updates
- Distribute positive news clips to members
- Roll-out new logo, website, grassroots effort as part of membership mobilization campaign
- To mobilize members, we will:
  - Recruit and train select members to do outreach to media and government officials
  - Mobilize members to reach out to local affiliates of key interest groups (e.g. AAEP, AVMA, APhA, etc.)
  - Use the website to generate member correspondence to:
    - Their local newspaper editors
    - State and federal government officials (from their Member of Congress to their Board of Pharmacy)

#### Priority Level Two

- **Demonstrate the profession's responsibility, ability to self-monitor.** One of the main charges against compounding is that it is practiced recklessly. We will demonstrate to policymakers and the public that IACP and its members are responsible stewards for their patients. With initiatives around accreditation, reporting, labeling and potency underway to varying degrees, we should discuss more thoroughly what tangible results these efforts will produce and when, and how we can use them to the greatest effect with media, policymakers and other stakeholders. While it is difficult to recommend specific supporting activities at this point, we would, at a minimum:
  - Pursue media coverage of our efforts
  - Communicate our efforts to the Administration, Members of Congress and their key staff members
  - Seek endorsements from organizations like APhA, NCPA, AVMA, etc.
- **Get positive stories in the media.** A Lexis-Nexis search of compounding turns up more negative stories than positive ones. Most people – whether the general public or policymakers – don't even understand what compounding is. And among those that do, contrary to the good work being done everyday by compounding pharmacists, many have a primarily negative association with it. We will work to feed the media positive stories about compounding to positively shape perceptions and balance the negative stories. While we will pursue feature stories in vertically targeted periodicals and local newspapers, we will need a more substantial hook for communicating to national and trade healthcare reporters. Similar to our Hill outreach, we think our efforts to develop and fund an accreditation program can provide the right hook for these reporters. Our media efforts will include the following activities:
  - Develop a deck and brief key national health and health policy reporters
    - National dailies, newsweeklies
    - National broadcast networks
    - Beltway publications
    - Health, pharmacy trades

- Pursue niche feature stories in periodicals
  - Women's interest (O, Redbook, More, Family Circle)
  - Pet owners (Equus, Cat Fancy, Dog Fancy, Bird Talk)
  - Parenting (Parenting, American Family)
  - Health and fitness (Men's Health, Shape, Fit Pregnancy)
- Pursue positive features on local pharmacists in major markets, key Members' districts
  - Review existing positive letters from patients to select the most moving stories
  - Where applicable, develop a database of those who have written letters to mobilize letter-writing and op-eds in key Member districts
  - Develop section of website for patients to submit positive stories
  - Develop "What Our Patients Are Saying" document (for website and press kit) featuring standout quotes about compounding

#### Priority Level Three

- **Mobilize a states' rights and pro-business campaign.** There is another group of third-parties that we can mobilize to oppose FDA's efforts from the perspectives of states' rights and small business advocacy. For this, we would approach various individuals and organizations to issue statements, write letters to Congress and the Administration, sign op-eds, file amicus briefs, etc. These third-parties include:
  - States' rights advocates
    - Individual state Attorneys General
    - National Association of Attorneys General
  - Small business advocates
    - National Federation of Independent Business (NFIB)
    - Local Chambers of Commerce
  - Conservative think tanks like Heritage, Cato and AEI, which adhere to both ideologies

**Develop state Boards of Pharmacy strategy.** A larger goal for the profession is garnering more awareness and representation with individual state Boards of Pharmacy. Although there have been efforts to place compounding pharmacists on board, we believe a comprehensive plan makes sense. A few places to begin include:

- National Conference
  - Maximize representation of profession at the conference through exhibitors, speaking roles
  - Develop messaging materials specific for the Boards
- Secure representation of compounding pharmacists on Boards
  - Target key states where we have credible compounding champions at the local, state level
  - Develop farm team at the state level for eventual push to include a compounding pharmacist on the National Association of Boards of Pharmacy Executive Committee
- Identify and educate potential allies on existing state Boards

**Next Steps:**

- Prioritize elements of program and build a timeline
- Finalize issue book and begin developing deck for media and third-party briefings
- Set goals to measure program's success

We look forward to discussing this with you.