

# Patient-Reported Outcomes in United States Promotional Communications for Drugs and Biologics: A Review of Drug Promotion Untitled Letters from the FDA

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## Objective

This study aimed to analyze attributes of enforcement of patient-reported outcome (PRO) promotional content in FDA's Untitled Letters (letters that are "used for violations that may not meet the threshold of regulatory significance for a warning letter and request correction of the violations").<sup>1</sup>

## Conclusion

Our review of FDA communications found that the FDA's Office of Prescription Drug Promotion identified key findings regarding attributes of enforcement for promotional communications containing PROs. Understanding FDA's current thinking on violative promotional materials with PROs and adopting early planning to ensure the study design and PRO strategy satisfy the FDA criteria are warranted if PRO endpoints are to be used in promotional communications.

## Background

- Patient-reported outcomes can be used to understand the risk benefit assessment of an intervention.<sup>2</sup>
- FDA guidance on PROs provides a framework on the use of PROs to support medical product development.<sup>2</sup>
- The number of clinical trials including PRO measures has increased over time.<sup>3</sup>
- Patient-reported outcomes data may be included in promotional materials along with other clinical trial data to communicate data about the product.
- Manufacturers may want to communicate their PRO data promotionally to help support their value proposition and optimize patient care.
- There is limited publicly available insight into FDA considerations regarding the presentation of PROs in promotional communications.
- One mechanism of regulation is through FDA Untitled Letters.

## Materials and Methods

- A review of the Office of Prescription Drug Promotion Untitled Letters available on the FDA website from January 1, 2017, to December 31, 2025, was conducted to identify promotional communications that contained references to PROs (Figure 1).
- Search terms used were: PRO, patient reported outcomes, quality of life, QOL, health related quality of life, HRQoL.
- The following data was extracted from the Untitled Letters:
  - \* Date of Untitled Letter
  - \* Therapeutic Area
  - \* Drug Category (small molecule or biologic)
  - \* Regulatory Concerns
- Data were reported descriptively

## Results

- In total, 93 Untitled Letters were reviewed between January 1, 2017 to December 31, 2025 (Figure 1).
- Eight Untitled Letters included promotional communications containing PROs (Figure 1).
- Majority of the untitled letters were received in 2025 (Figure 2).
- Out of the eight letters that pertained to PROs:
  - \* Half included Oncology indications (Figure 3).
  - \* Four were for small molecules and four were for biologics (Figure 4).
  - \* Claims not supported by data were the most commonly cited violation (Figure 5).
  - \* Television Ads were the most common form of promotional communication (Figure 6).

Figure 1. Identification of FDA Untitled Letters Flow Diagram

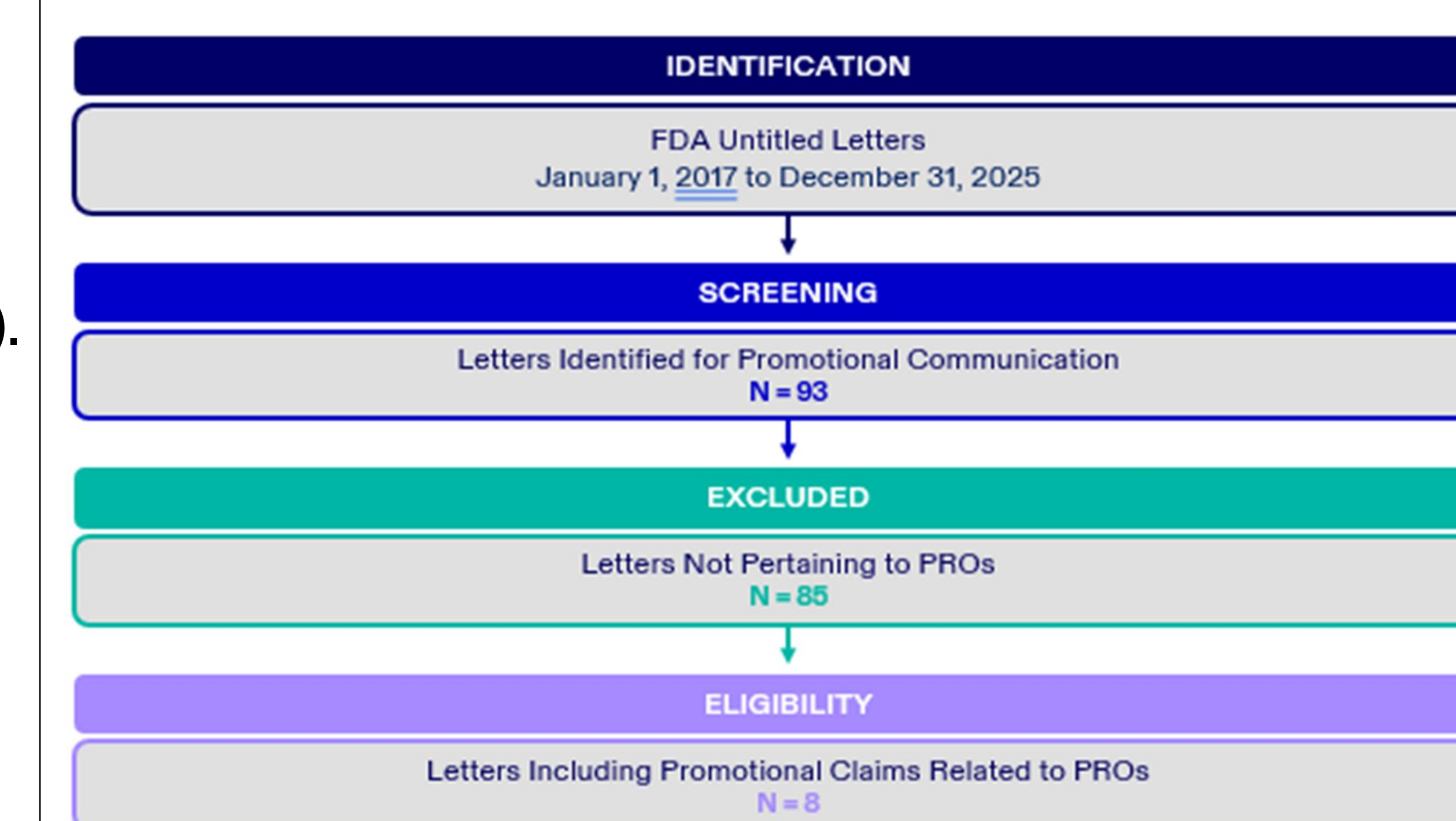


Figure 2. Issuance of FDA Untitled Letters Pertaining to PROs by Year

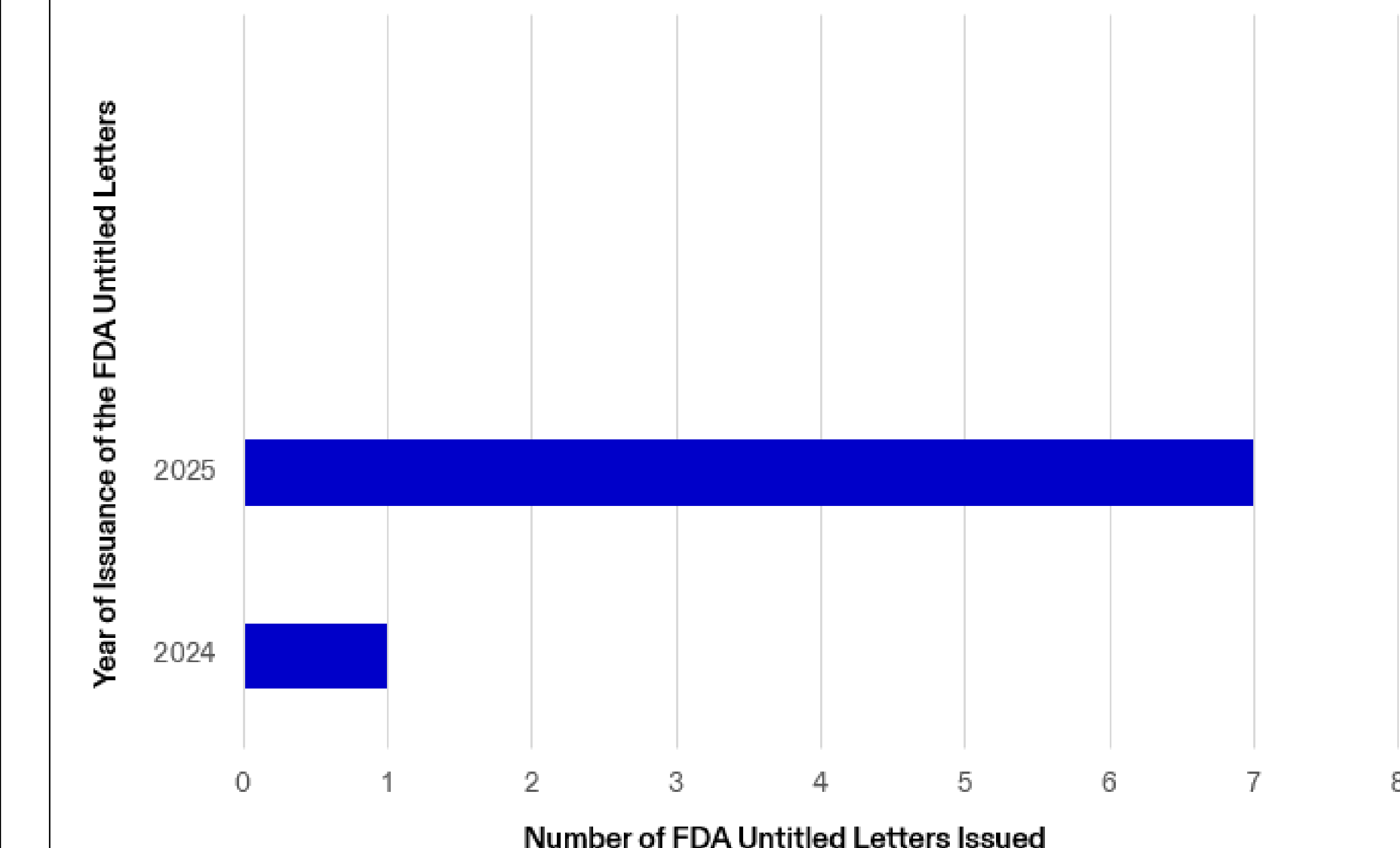


Figure 3. FDA Untitled Letters with PRO Promotional Communication by Therapeutic Areas

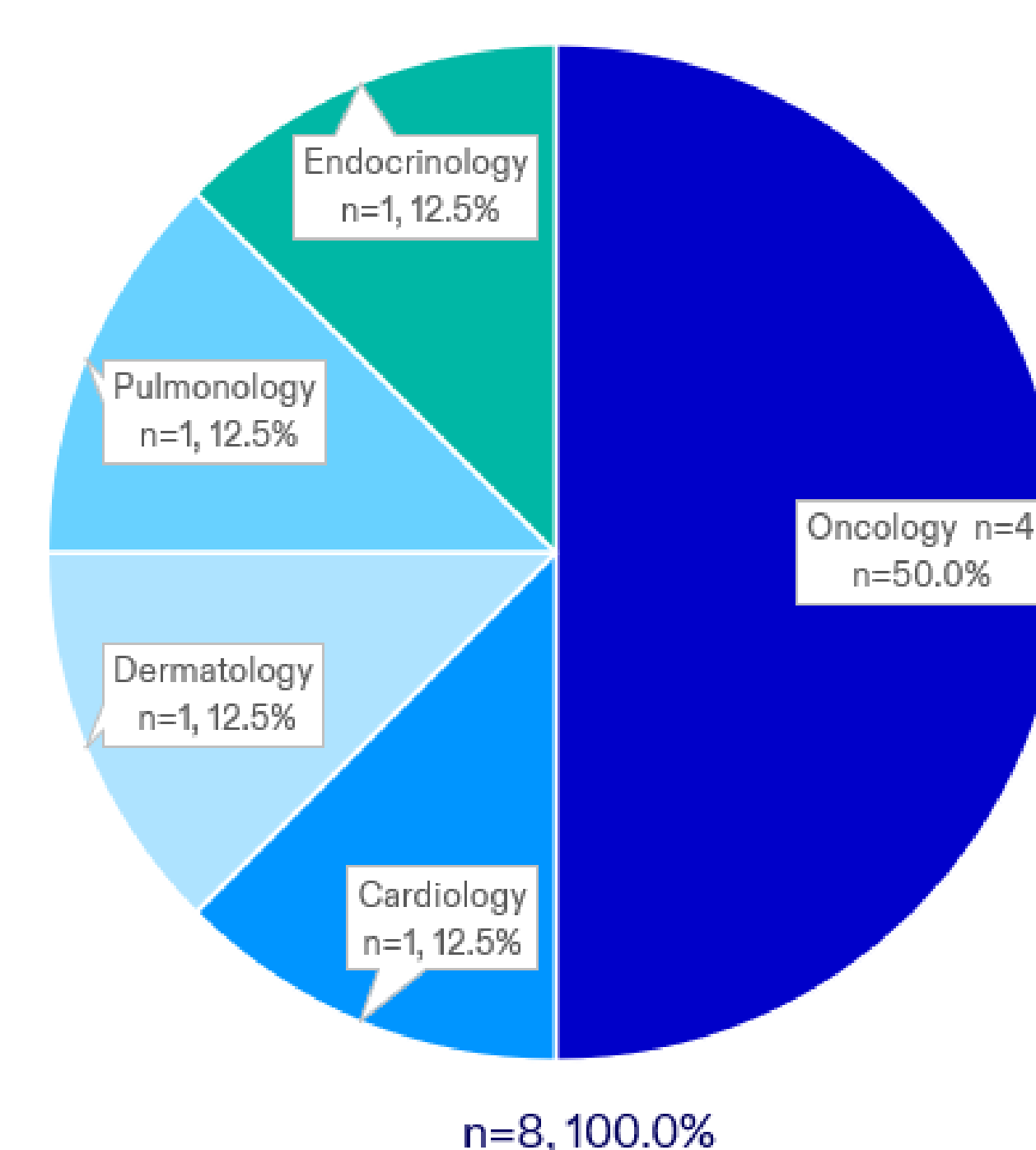


Figure 4. FDA Untitled Letters Containing PROs by Drug Categories and Therapeutic Areas

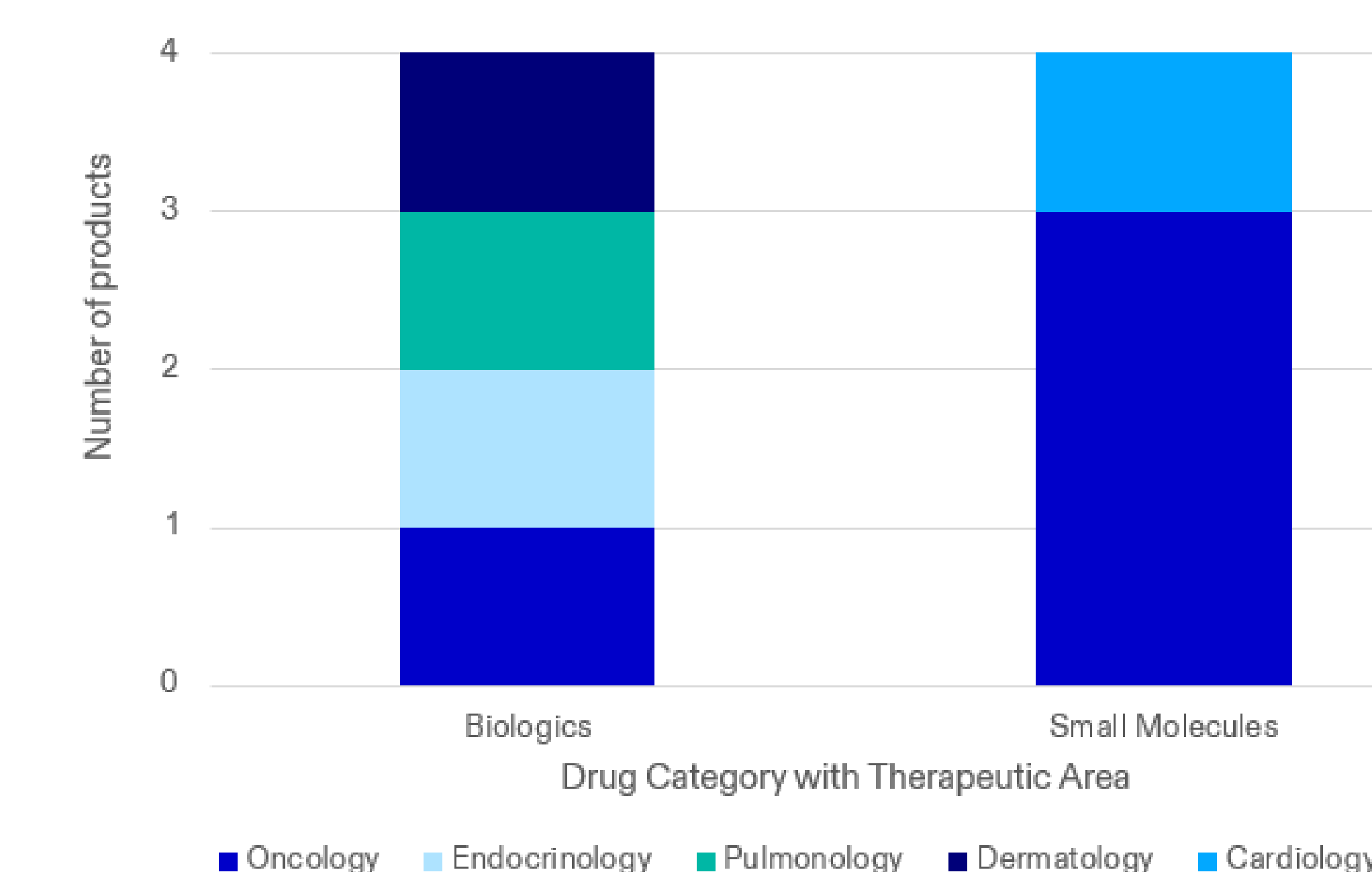


Figure 5. Distribution of 17 Recurrent Regulatory Violations From Eight FDA Untitled Letters Containing PRO Promotional Communication

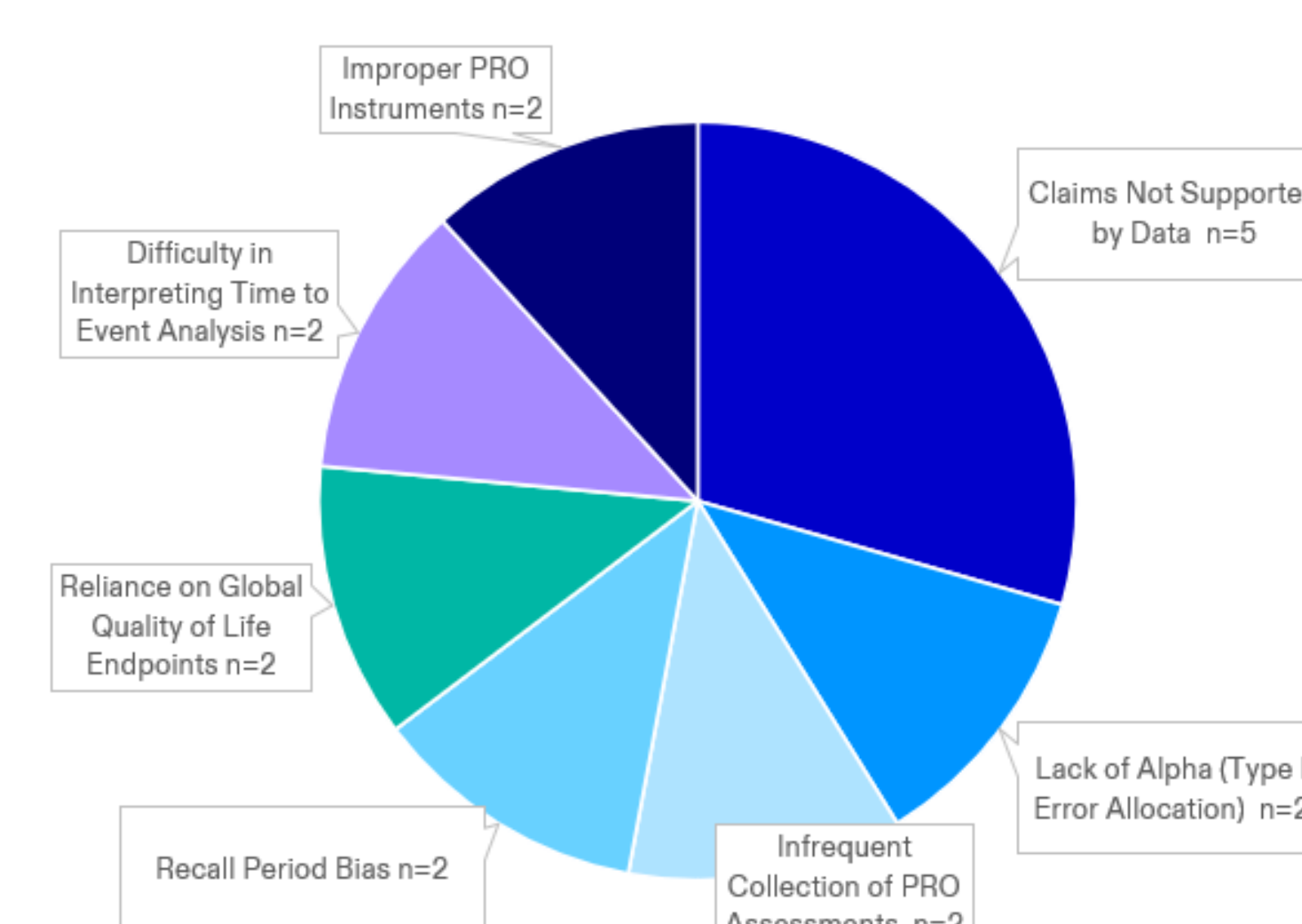
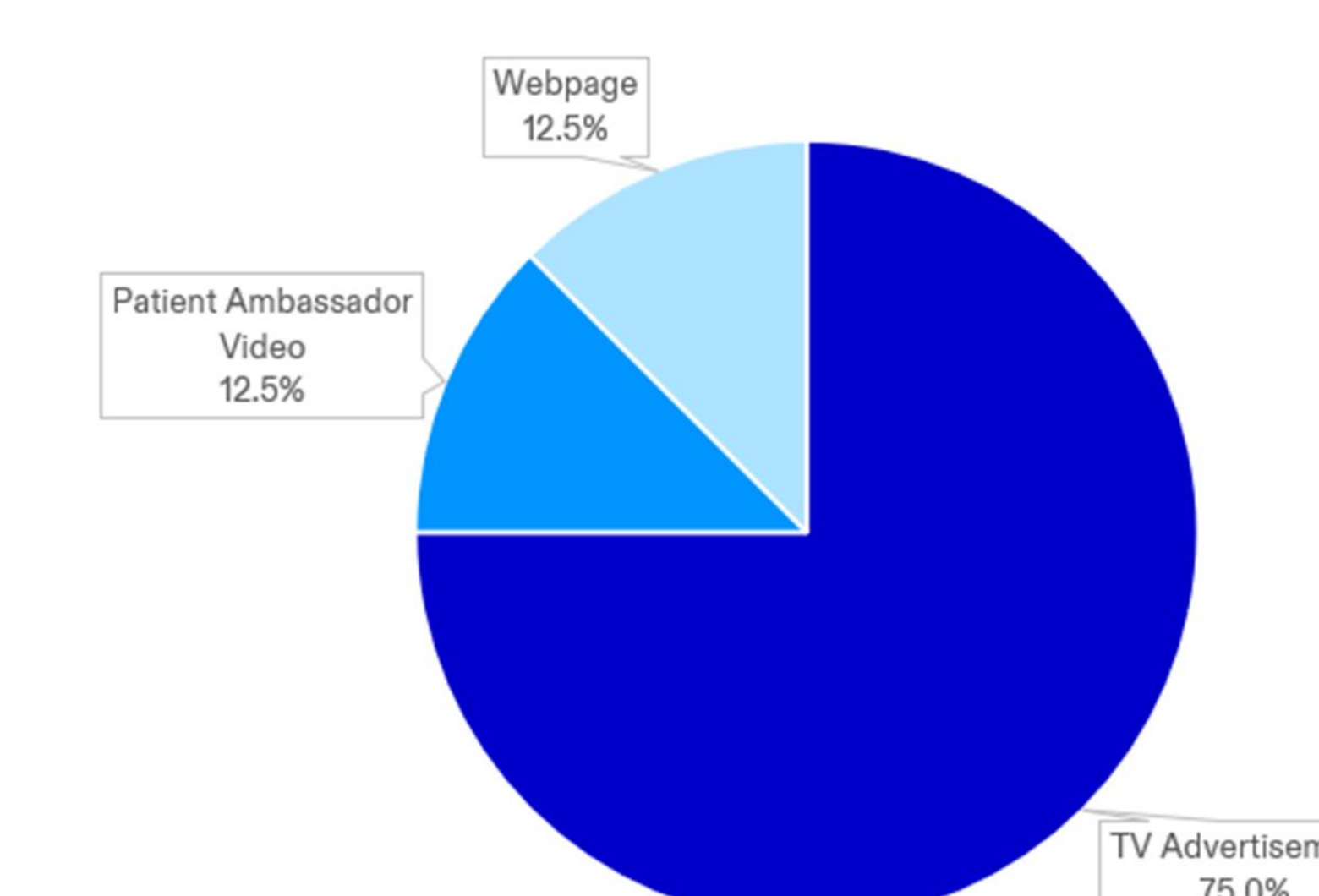


Figure 6. Channel of Promotional Communication of FDA Untitled Letters with PRO Content



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## References

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3. Maja Kuharic, et al. Patient-Reported Outcome Measures in Clinical Trials: An Analysis of Trends From 2008 to 2023. *Value in Health*, Volume 29, Issue 3, 2026, Pages 449-456, ISSN 1098-3015, <https://doi.org/10.1016/j.jval.2025.10.017>.

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