



Good Communication Practices

The life sciences industry is highly regulated, and as such, all communication is subject to scrutiny from both federal and state enforcement agencies.



What are They?

Good Communication Practices help facilitate efficient communication while providing guidelines for the dissemination of information that is subject to an extra layer of scrutiny. Good Communication Practices ensure that information is communicated in a manner that is sensitive to today's life sciences environment.



What They are Not

Good Communication Practices are not about how to hide actions or "get around the rules." A questionable action doesn't have to be tracked in writing for it to be discovered.

They should not be utilized to regulate or censor what needs to be communicated.

The use of email and other forms of electronic communication is a preferred method for sharing critical information quickly and efficiently. There are key points to keep in mind when communicating via electronic methods.



"e" Documents are Forever

- ▶ Email messages and all electronic communication offer the advantage of saving the "stream" of the conversation, or inviting others to join the conversation. By its nature, virtually any electronic communication is saved somewhere.
- ▶ "Deleted" does not mean "destroyed." Even deleted documents can be recovered.
- ▶ If a message is highly sensitive, be sure to use additional security to prevent forwarding or printing.
- ▶ E-documents extend beyond email. Call notes, voicemails, text messages, and instant messages are also stored and recoverable.
- ▶ E-documents are often sought first during an investigation.



Rules to Write By

- 1. Watch phraseology** Colloquial terms or some industry phrases (e.g., top doc) are not always known or understood by those receiving your e-mail. Use of colloquialisms may result in a reader misinterpreting the intent of your message. Ask yourself if the language is necessary to communicate the point, or if it casts a questionable light where none exists.
- 2. Keep it Simple and Succinct (KISS)** Meaning and tone are often lost in written communication. Additionally, a long drawn out email can be confusing. Complex matters are often better discussed live.
- 3. Rein in the Reply** Constant back and forth in emails tends to clutter the conversation. If clarity is needed, consider taking the conversation live.
- 4. Forward is not your Friend** Be selective when forwarding messages. Only forward messages to those to whom the conversation is most relevant. Remember, you lose control over a message once you forward it.
- 5. Don't be a "Copy Cat"** Similar to forwards, be selective about who is copied on messages. Only copy people who truly need the information. Once others are invited into the conversation, they are free to do as they see fit, and your control is limited.



Documents

What is a document? Essentially, any information item, whether paper or electronic, can be considered a document.

Examples of documents include:

- ▶ Emails
- ▶ Call notes
- ▶ Memos
- ▶ Training materials
- ▶ Promotional materials
- ▶ Policies and procedures
- ▶ Press releases
- ▶ Text messages
- ▶ Voicemail messages
- ▶ Instant messages
- ▶ Expense reports
- ▶ Tweets

This is not an exhaustive list, but any information that is communicated or stored is subject to review in an investigation.