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 **April 1 – June 30, 2025.** 

318

Completed Surveys

April 1 to June 30, 2025.

### Averages of the CEI question survey results by question:

1. Staff connected with this eFile (e.g., File Coordinators,	4.7/5		
Reviewers, Senior Reviewers, etc.) were helpful and responsive	Indicating an average response between "Agree" and "Strongly Agree"		
2. Comments and suggestions in response letters, calls and	4.5/5		
messenger were clear and actionable.	Indicating an average response between "Agree" and "Strongly Agree"		
3. I felt the review was:			
1. Highly inconsistent	3.8/4*		
2. Somewhat inconsistent			
3. Somewhat consistent	Indicating an average response between "Somewha consistent" and "Highly Consistent"		
4. Highly consistent			
5. I don't know			
*This average rating is calculated from Responses 1-4 as incl the average upward. There were 4 ratin			
<b>4.</b> Please provide any other feedback specific to this file: [optional open text field]	See feedback themes below.		
<b>5.</b> Please rate your overall experience with this particular review.	9.1/10		
<ul><li>1 – highly negative experience</li><li>10 – highly positive experience</li></ul>	Indicating a positive average overall experience.		

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#### **Key Themes and Actions Taken from Open-Text Feedback:**

Please note that there were minimal comments this quarter.

- 1. Request for more context behind decisions (n=3). We heard that clients would appreciate more background information on why certain copy or references are not acceptable.
- Action Taken: Our review team discussed ways to provide clearer, more detailed explanations when identifying an issue initially. The goal is to support client understanding and strengthen everyone's knowledge base. This could include outlining the type of reference required to substantiate a claim, pointing to specific guidance documents that explain how the code is applied, or to similar issues raised on the forum.
  - By offering this added context, we aim to make the review process more collaborative and help you feel confident in how to move forward.
  - 2. Considerations for Code updates (n=4). There were a few comments that focused on elements of the Code which caused frustration during the review process. PAAB would like to remind clients that CEI surveys are about the experience with staff and their services. We have the "Tag" system where we encourage users to use the tag "Consider changing the code/guidance". While we appreciate that this might feel like it impacts the experience, it's important to provide feedback in the CEI that helps to improve interactions or reinforce positive interactions. At the end of the day, the Reviewer is still bound by the regulations as they are currently set.
- Action Taken: PAAB is looking into the review practices for things like formulary claims. We're open to exploring areas which could be updated while maintaining the integrity of the Code and advertising pieces.
  - 3. "Pending ongoing review" comments (n=1). In one case, we found that using the comment "pending revisions in ongoing review" contributed to delays in the client's production timeline. While this approach can create efficiencies on the PAAB side, we recognize that it may not always align with the client's project priorities.
- Action Taken: Our Reviewers discussed how and when it's best to use the "pending resolution in ongoing files" comment. When the same copy appears across multiple pieces, it's often more efficient to resolve the issue in one file and then apply the change across all related files. However, this works best when we clearly understand which files matter most to you.

To better support client timelines, we're exploring ways to keep reviews efficient while ensuring files continue to move forward. We also encourage clients to connect with our admin team during the review process to share which pieces are top priority for clients.

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#### **Key Takeaways:**

- Survey Completion Rate is 20.4%, with this data capturing 318 responses out of 1556 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 and 2024.

Did you know? Now you can forward your CEIs to non-eFiles users for completion. In response to feedback that not all team members have eFiles accounts, we have updated our systems to allow the most appropriate team member to complete the CEI regardless of whether or not they have an eFiles account. Simply forward the CEI invitation to the appropriate team member and they can complete it. Please note that the survey can only be completed once.

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 Preclearance 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 <u>Client Tagging System</u> Advisory. You'll also find links to useful videos on <u>tagging a review</u> and <u>tagging phone calls</u>.

If you'd like to learn more about CEIs, see <u>Customer Experience Index</u>.

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### A Quarterly Review of the eFiles Tag Report

#### Total number of submissions\*

QUARTER 1	QUARTER 2	QUARTER 3	QUARTER 4
2107	2174		

<sup>\*</sup>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
18	10		

### Tag submitting company and manufacturer distribution

QUARTER 1	QUARTER 2	QUARTER 3	QUARTER 4
4 & 1	1 & 4		

### Therapeutic area distribution

	QUARTER 1		QUARTER 2	QUARTER 3	QUARTER 4
4	Pulmonary	4	Psychiatry		
3	Neurology	3	Dermatology		
3	Psychiatry	2	Pulmonary		
3	Dermatology	1	Women's Health		
2	Oncology				
2	Infection & Infestation				
1	Gastrointestinal				

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#### Total number of tags deemed valid following internal review

QUARTER 1	QUARTER 2	QUARTER 3	QUARTER 4
9	3		

### Validated tag breakdown

	QUARTER 1		QUARTER 2	QUARTER 3	QUARTER 4
2	Inconsistent with code guidance	1	Issue with level of expertise		
3	New issue raised late in the review	1	New issue raised late in the review		
2	Issue with level of expertise	1	Request unclear even following clarification call		
1	Inconsistencies with historic approvals for the same brand				
1	Particularly helpful comment				

#### Q2 PAAB Action Taken:

While no consistent trends were observed across this quarter's tickets, PAAB continues to use each one as an opportunity to reinforce best practices with the Review team.

The tickets prompted a helpful reminder around the importance of avoiding late comments. While we strive to prevent these entirely, we recognize that on rare occasions they may occur. In response, Reviewers discussed practical ways to help minimize the impact on clients, such as prioritizing the review upon resubmission, offering to jump on a quick call, and being as clear and specific as possible about the nature of the comment and potential solutions.

Reviewers also discussed how to enhance the clarity of their guidance overall. This includes providing concrete examples, direct links to relevant guidance documents, and references to precedent files. These help to better explain both the rationale for the request and how to address it in revisions.

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Reasons for not validating a tag:

The invalid tags this quarter had a trend in misunderstanding of PAAB Code guidance documents by the submitter. This led to the submitter perceiving there to be a lack of expertise. Evaluation of the initial guidance and final ruling uncovered no lack of expertise.

Is there more information you would like to know and see in the next quarterly update? Let us know on the <u>Forum</u>.