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Developing alternative over-the-counter medicine label formats: How do they compare when evaluated by consumers?

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Developing alternative over-the-counter medicine label formats: how do they compare when evaluated by consumers?

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Conflict of interest

David K. Raynor is co-founder and academic advisor to Luto Research (www.luto.co.uk) which develops, refines and tests health information materials.

Developing alternative over-the-counter medicine label formats: how do they compare when evaluated by consumers?

- 3 Abstract
- 4

E	Packaround
5	Бискугоини

- 6 In recent years, the Australian Therapeutic Goods Administration (TGA) has proposed
- 7 implementing a standardized over-the-counter (OTC) medicine label. However, there
- 8 were mixed consumer opinions regarding a label proposed in 2012 and limited
- 9 evidence demonstrating the usability of the revised (2014) format.
- 10 *Objective*
- 11 To develop and examine the usability of alternative OTC medicine label formats for
- 12 standardization, and explore consumer perspectives on the labels.
- 13 Materials and methods

Four alternative labels were developed for the exemplar medicine diclofenac. One was
based on the Medicine Information label proposed by the TGA ('Medicine

- 16 Information'), one was based on the U.S. Drug Facts label ('Drug Facts'), and two were
- 17 based on suggestions proposed by consumers in the earlier needs analysis phase of
- 18 this research (referred to as the 'Medicine Facts' and 'Consumer Desires' label
- 19 formats). Five cohorts of 10 participants were recruited. Each cohort was assigned to
- 20 user test one of the alternative labels or an existing label for a proprietary diclofenac
- 21 product (which acted as a comparator) for diagnostic purposes. Each participant then
- 22 provided feedback on all 5 labels. Each interview consisted of the administration of a
- 23 user testing questionnaire, measuring consumers' ability to find and understand key
- 24 points of information, and a semi-structured interview exploring consumer

25 perspectives.

27 Results

- 28 Overall, all 4 alternative label formats supported consumers' ability to find and
- 29 understand key points. The existing comparator label was the poorer label with
- 30 respect to participants' ability to find and understand key points. Factors such as
- 31 perceived usability, color, design, content, and/or content ordering impacted
- 32 consumer preferences. The 'Consumer Desires' or 'Drug Facts' label formats were
- 33 most often preferred by consumers for use as the standardized OTC label over the TGA
- 34 proposed format.

35 Conclusions

- 36 All alternative label formats demonstrated satisfactory usability and could be
- 37 considered for use in OTC label standardization. User testing of OTC labels and
- 38 consumer feedback received as part of the testing process can assist in the refinement
- 39 of OTC labeling to ensure that implemented policies are evidence-based.

40

41 Keywords

- 42
- 43 Drug labeling; user testing; nonprescription medicines; comprehension; consumers.

44

46 Introduction

47

Availability and access to over-the-counter (OTC) medicines is essential to support 48 consumers in their autonomy and choice to self-manage minor ailments. Appropriate, 49 50 user-friendly information must therefore accompany OTC medicines to facilitate this, notably the information included on OTC medicine packaging. This information, 51 52 hereafter referred to as the OTC label or OTC labeling, encompasses both the medicine information included on the packaging and how it is presented i.e. the label's design. 53 A complex interplay of factors is involved in balancing the design and content included 54 on an OTC label to yield a written medicine information source that is fit-for-purpose.¹ 55 Various strategies help to safeguard and/or improve OTC labeling quality, such as 56 legislation and guidelines.^{2, 3} Application of guidelines such as good information design⁴ 57 result in improved OTC labeling.¹ However, label design may not always adhere to 58 guidelines,^{5, 6} and deficiencies may lead to suboptimal comprehension of OTC medicine 59 information.¹ An example of a more specific strategy to optimize medicine labeling is 60 the standardization of OTC labels in the United States (U.S.) using the Drug Facts label 61 format.⁷ Testing demonstrated a number of positive benefits associated with this 62 standardized format⁸ such as improvement in the time to locate information.^{9, 10} 63 In recent years, OTC label standardization as a strategy has also been proposed for 64 implementation in different regulatory contexts such as Australia^{11, 12} and Canada.¹³ 65 66 The rationale for OTC label standardization, as proposed by the relevant Australian and Canadian regulatory authorities, was underpinned by the aim of promoting safer and 67 more effective use of OTC medicines by consumers.^{11, 13} If information was presented 68 consistently, it was postulated that it would support appropriate self-selection of OTC 69 medicines and that consumers could more easily locate information on OTC labels 70 across different products.^{11, 13} 71 72 Within the Australian context, as part of a general public consultation in 2012, the

73 Australian Therapeutic Goods Administration (TGA) sought feedback on a proposal put

- 74 forward for standardized OTC labeling in Australia.¹¹ However, there was a lack of
- 75 published data detailing consultations with consumers that helped to inform the

76 details of this proposal. Consequently, in response to the initial 2012 consultation, 77 semi-structured interviews were conducted with 38 Australian and 39 UK consumers 78 to explore consumer opinions on OTC label standardization and the Medicine Information Box format (MIB) (which was the proposed standardized OTC label 79 format¹¹ presented in the 2012 Australian TGA consultation paper).¹⁴ Additional focus 80 group discussions complemented the interviews and explored consumer perspectives 81 on current non-standardized Australian OTC labels, and the U.S. Drug Facts label (on 82 which the MIB is based¹¹), in comparison to the MIB.¹⁵ It was found that in general, 83 consumers felt positively towards OTC label standardization, which was regarded as a 84 strategy that could help promote ease and familiarity in retrieving information from a 85 label.¹⁴ However, mixed consumer opinions on the MIB format were highlighted and a 86 plethora of suggestions for improvement were also proposed.^{14, 15} Moreover, 87 consumers also indicated a preference for the Drug Facts label format over the MIB.¹⁵ 88 Consequently, this emphasized the need to explore ways to redevelop and optimize 89 the MIB format prior to its integration into updated OTC labeling policies. 90 Proceeding the 2012 consultation, a further public consultation on an updated 91 proposal was conducted in 2014¹² along with a targeted consultation in 2015.¹⁶ 92 93 Despite this, a paucity of evidence exists in the published literature supporting the 94 usability of the specific TGA OTC standardized label formats proposed in both 2012 and 95 2014 for implementation within an Australian context. Additionally, there is a lack of data comparing its usability with other label formats that have been developed using 96 feedback directly obtained from consumers. Unlike how the U.S. Food and Drug 97 Administration tested their proposed Drug Facts label with consumers,⁷ the superior 98 usability of the TGA proposed standardized format, and thus, further reassurance that 99 100 the labeling policy is evidence-based from a label usability perspective, has not been clearly demonstrated in the published literature. Therefore, this study aimed to: 101 102 1. Develop and test alternative standardized OTC medicine label formats, informed by consumer opinions and good information design; 103 2. Compare the usability of the developed OTC label formats to an existing 104 105 Australian OTC label for the exemplar medicine diclofenac; and 106 3. Explore consumer perspectives on all study labels.

107 Materials and methods

109	The present study forms part of a broader international collaborative project on OTC
110	labeling improvement and standardization. Research ethics approval for the conduct of
111	this study was obtained from the Human Research Ethics Committee of Institution 1.
112	Participants provided written informed consent prior to participation. All participants
113	were reimbursed for their time.
114	The present study comprised two stages:
115	1. Development of alternative standardized OTC label formats, and
116	2. User testing of the label formats with consumers.
117	
118	Development of alternative standardized OTC label formats
119	Within the broader international project, a qualitative needs analysis (semi-structured
120	interviews ¹⁴ and focus groups ¹⁵) was conducted with consumers to explore their
121	opinions on existing and proposed OTC labeling strategies to help inform OTC label
122	optimization. Label development commenced after the needs analysis had been
123	completed. The needs analysis findings were evaluated by an international panel and
124	consensus was reached by the research team on the specific suggestions to be taken
125	forward. Broad reasons why certain suggestions were not taken forward included:
126	• The suggestions were outside the scope of the study e.g. use of Braille on the
127	packaging, pictographs;
128	• The suggestions were too content-specific and/or could negatively impact the
129	safe use of the medicine e.g. deletion of important information relevant to
130	when the product is being used; and/or
131	• The suggestions were only proposed by a very small number of consumers.
132	The needs analysis findings were used in consultation with a UK information design
133	expert, together with reference to good information design principles ⁴ and use of plain
134	English, to inform the development of alternative OTC label formats for the exemplar
135	medicine diclofenac that could be considered for implementation as part of a label
136	standardization policy (Table 1, Figures 1-4).

138			diclofenac
		Label	Brief description
	Existing or	'Medicine Information' (Figure 1)	This label was based on the design outlined in the Australian TGA consultation paper released in August 2014, ¹² which appeared to integrate the findings from the initial consultation ¹¹ (replacing the Medicine Information Box (MIB) label proposed in 2012).
	proposed standardized		Black print on white background
	label formats	'Drug Facts' (Figure 2)	This label was based on the Drug Facts standardized OTC label format implemented in the U.S. ⁷ Many focus group participants ¹⁵ preferred this format.
			 Black print on white background Information split across 2 panels (of the box)
_		'Medicine Facts' (Figure 3)	'Medicine Facts' was a consumer-proposed label title. ¹⁵ The needs analysis findings were applied in the development of this format. ^{14, 15} Aspects of previously implemented and tested written medicine information formats such as the U.S. Drug Facts label ⁷ and Australian Consumer Medicine Information ¹⁷ formats were also integrated.
	Novel label		 Navy blue print on white background Information split across 2 panels (of the box)
	formats developed	'Consumer Desires' (Figure 4)	Findings from the needs analysis were applied to inform the development of this format. ^{14, 15} Some specific consumer desires ¹⁴ were integrated into this format as they were seen to have merit, but which were not reported by a large proportion of consumers.
	Ċ		 Navy blue print on light blue background Warnings section presented in red Simple pictograph system highlighting indications and contraindications using ticks and crosses, respectively

137 Table 1. Developed alternative standardized OTC label formats for exemplar medicine

- 140 A total of 4 designs were developed and finalized via consensus amongst all research
- 141 team members for the exemplar study medicine diclofenac (Table 1, Figures 1-4). The
- 142 MIB format developed for earlier research^{14, 15} for diclofenac (one of the exemplar
- 143 medicines utilized in previous studies) was adopted as the baseline label and additional
- 144 label content, where necessary, was derived and/or adapted from the information
- 145 available for an existing diclofenac product (Voltaren[®] Rapid 25 tablets).^{18, 19}

146 Each label was incorporated and presented as part of complete OTC packaging for the 147 fictitious brand "Viffarol" for evaluation (Figure 5 provides an example of the complete OTC packaging). The complete OTC packaging size was uniform for all Viffarol labels; 148 when assembled, the packaging dimensions were: 115 mm (I) x 48 mm (w) x 24 mm (h). 149 An existing label for an Australian diclofenac proprietary product (Voltaren® Rapid 25 150 tablets¹⁸; dimensions: 105 mm (I) x 45 mm (w) x 20 mm (h)) was also chosen as a 151 comparator label format for user testing to help evaluate the relative usability of the 152 OTC label formats. No changes were made to the existing Voltaren® Rapid 25 label. 153

154

155 User testing of the label formats with consumers

Once all alternative label formats were developed, user testing of the label formats 156 was then undertaken with consumers. User testing¹⁷ is a method of testing conducted 157 158 with members of the public that is used as the standard in Europe to test patient information leaflets. It has also been advocated for use in OTC label development,² 159 used in usability testing and improvement of written medicine information.^{17, 20, 21} User 160 testing was conducted with demographically matched cohorts of consumers as a 161 diagnostic measure of the usability of the developed label formats. Both quantitative 162 and qualitative data were obtained using a standardized user testing questionnaire 163 164 (UTQ) developed specifically for the exemplar medicine diclofenac. Explicit user testing 165 outcome measures used to ascertain the usability of the written medicine information 166 included the ability to find and understand the information. Thus, each study 167 participant only user tested 1 of the 5 labels to ensure that the validity of both key outcome measures was not compromised due to factors such as recall of information 168 relevant to diclofenac. 169

170

Development of the user testing questionnaire and semi-structured interview protocol
A UTQ was developed, consisting of 13 core items that encompassed key points of
information specific to the diclofenac product as agreed upon by 3 pharmacists
(Authors 1-3). Some UTQ items were derived from the UTQ used in an earlier study
(within the broader international collaborative project) that evaluated a label and
leaflet for diclofenac (manuscript prepared for publication).

Questionnaire items were asked in an order which minimized key points corresponding
to the exact order they appeared in the information across the label formats (so that
respondents did not learn that the relevant information to answer a question was
positioned immediately after that for the previous question). The standardized order
of questions was also intended to minimize any order effects within and between
cohorts.

183 A semi-structured interview protocol was also developed for use after the UTQ to

184 explore consumer perspectives on the label formats (Appendix 1). Both the UTQ and

semi-structured interview protocol were piloted with 2 non-medically trained people

and 2 pharmacists engaged in research for face and content validity, which involved

187 detailed individual review of all questions. Approximately 2 weeks afterwards, each

188 person completed the entire face-to-face session as a mock participant (with the

189 interviewer) to determine whether any further improvements to the interview process

190 were required. Minor amendments to the wording of items included in both the UTQ

and interview protocol were subsequently made to improve item clarity.

192

193 User testing- participants and setting

194 Study recruitment was conducted between April and October 2015 using online

advertisements, recruitment flyer distribution, and by a market research company.

196 Consumers were eligible to participate in the study if they were:

- 197 18 years or older,
- Conversant in English (did not require the assistance of a translator to complete
 the interview tasks),
- Had purchased and used an OTC medicine (for themselves or had given it to a
 person under their care) within the 6 months prior to study participation,
- Had not used diclofenac (either for themselves or given to a person under their
 care) within the 6 months prior to study participation, and
- Had not used or given someone under their care a medicine from the same
 therapeutic class as diclofenac (non-steroidal anti-inflammatory drugs (NSAIDs)
 for pain relief) within 1 month prior to study participation.

Had participated in a user testing study in the 6 months prior to study

Were currently employed in an occupation which primarily involved the use of

212 participation, or

•

Participants were excluded if they:

medicine information,

207

208

209

210

211

Had significant visual or cognitive impairment that could affect study
participation.

Were a retired or practicing health care professional,

In accordance with user testing guidelines in place in the European Union for written 215 medicine information, satisfactory usability is achieved when a minimum of 8 out of 10 216 participants in a cohort are able to demonstrate their ability to both find and 217 understand each key point of information.²⁰ As user testing was used diagnostically, 218 219 only 10 participants per label format were required for one round of testing; where 220 applicable, additional testing can be undertaken to evaluate necessary label revisions made as a result of any identified issues.²¹ Therefore, each cohort (that consisted of 10 221 participants) user tested a different assigned OTC label format for diagnostic purposes 222 223 and each participant then provided feedback on all 5 labels. Five cohorts of 10 participants were recruited. Each cohort was demographically matched using criteria 224 that were adapted from a previous study.²² These criteria acted as controlled variables 225 per cohort to ensure an adequate spread of participant demographics and allowed for 226 227 a degree of comparison between cohorts.

Each cohort was demographically matched by gender (at least 3 males and 3 females 228 per cohort of 10), education (a maximum of 3 participants per cohort of 10 having 229 completed a university degree or higher), occupation/use of written information (at 230 least 2 participants per cohort of 10 unemployed or retired, or did not regularly use 231 232 written information as part of their occupation), and age (at least 1 participant per 233 cohort of 10 representing each of the following adult age brackets: 18-29, 30-39, 40-49, 50-59, 60-69, and 70+ years). Once recruited, participants were assigned a specific 234 label to user test in order to ensure that all demographic requirements were met per 235 236 cohort.

237 Study protocol

238 Data were collected via individual face-to-face interviews, lasting approximately 1 hour

in total (at Institution 1). All interviews were conducted by 1 researcher (Author 1) to

- 240 ensure consistency in their conduct and were audio-recorded with permission from
- the participants.
- 242 Each face-to-face interview consisted of 2 parts:
- 243 (i) Administration of the UTQ to test 1 assigned label format, and

244 (ii) A semi-structured interview component exploring consumer opinions on all245 label formats.

- 246 At the interviews, participants were given a copy of the participant information
- statement and consent form to read and sign. The assigned label for testing was
- 248 provided to the participant and they were given as much reading time as required. The
- 249 structured UTQ was then administered. Participants kept the label in front of them at
- all times. Participants were then asked for their feedback on the label they had user
- 251 tested regarding aspects such as the design, content, and wording. All other labels
- were then presented together and participants were asked for their opinions on the
- 253 different label formats. All labels could be viewed side by side by the participants. They
- were also requested to rank all the label formats from the most to least preferred and
- explain their reasoning. Finally, they were asked to select a label format they would

choose to implement as a standardized OTC label format.

- 257
- 258

259 Data analysis

- 260 User testing data analysis
- 261 All audio recordings were reviewed after interview completion and participant
- 262 responses to the UTQ were transcribed verbatim for analysis. Responses were coded
- according to the model answers for the UTQ items as:
- Found and understood;
- Found but not understood, or;
- Not found (understanding was therefore not applicable).

To help provide an indication of the ease in locating the key point of information, in the instances where information was found, answers were noted to be found with difficulty if the participant:

- Took more than 2 minutes to locate the complete indicative answer on the
 label, or;
- Two or more prompts were required to be initiated by the interviewer (Author
 1) prior to the indicative answer being located in full on the label.

The above criteria for noting answers as 'found with difficulty' were adapted from a
 previous user testing study.²²

All coding was completed by 1 researcher (Author 1). Coding for finding and

277 understanding information was dichotomous. Therefore, regardless of whether an

- answer was found with difficulty, if the relevant information was located by the
- 279 participant, it was still coded as found. Similarly, responses were coded as understood

if an answer was provided that corresponded to the complete indicative answer to the

- 281 questionnaire item that was agreed upon by the research team members. All answers
- that were not clearly found and understood as per the model answers were reviewed
- by another researcher (Author 3) and reconciled where necessary to ensure that
- agreement was reached in their coding.

285

- 287 Semi-structured interview data analysis
- 288 The qualitative semi-structured interviews were transcribed verbatim. Each transcript
- was then checked against the audio recording to ensure accuracy. Checked verbatim
- transcripts were thematically analyzed.²³ Matrix displays²⁴ were developed and used in
- 291 preliminary data analysis to display the semi-structured interview data under broad
- themes. Themes and subthemes were then derived inductively from the data and
- 293 refined.
- 294 Participant label rankings were pooled for analysis and represented numerically. A
- standard competition ("1224") ranking approach²⁵ was utilized to take into account
- 296 equal label rankings nominated by some participants, where points were assigned to
- 297 correspond with each rank. Five points was awarded to the label ranked 1st (most
- 298 preferred) and the allocated points were decreased by 1 point with each subsequent
- rank to the minimum of 1 point awarded for the label ranked 5th (least preferred).
- 300 These were then tallied.
- 301

Results 302 303 304 A total of 50 participants (Table 2) completed the study (10 participants per label 305 format). 306 307 **User testing results** User testing results for the 4 alternative OTC label formats 308 309 Overall, the label formats generally well supported consumers' ability to both find and understand the majority of key points of information for diclofenac (Table 3). 310 UTQ item 8 relating to sucrose proved problematic for 2 participants in each relevant 311 312 cohort when the 'Medicine Facts' and 'Consumer Desires' label formats were user 313 tested (Table 3). Sucrose was unable to be located on the label by those participants. In response to UTQ item 10, related to persistent pain and the actions to be taken, 314 between 2 and 5 participants in each cohort had difficulty in finding the key 315 316 information; in particular, participants had difficulty understanding the maximum treatment duration before needing to contact their doctor (Table 3). 317 318 User testing results for the Voltaren[®] Rapid 25 comparator label 319 320 Despite participants' ability to locate the majority of key points of information when user testing the comparator label Voltaren® Rapid 25, it was the label format that 321 322 demonstrated poorer usability relative to the other labels. Specific problem areas were 323 the understanding of dosage, warning about use in pregnancy, and actions to be taken in relation to UTQ item 10 (Table 3). Maximum treatment duration could not be found 324 by 1 participant. 325

326

- 328 Feedback obtained on the user tested label format
- 329 Suggestions put forward by participants were categorised as design, content, or
- 330 wording improvements. Common broad improvements suggested for the label formats
- 331 included:
- More bolding of key terms or points of information,
- Increased font size, and
- Further use of color, in particular for highlighting or differentiation of
- information e.g. warnings information to be highlighted using the color red.
- 336 Other more label-specific suggestions for improvement have been summarized in
- 337 Table 4.

Page **14** of **40**

	140	ie 2. Summary		ographics			
Demographic		Voltaren [®] Rapid 25 cohort (n=10)	'Medicine Information' cohort (n=10)	'Medicine Facts' cohort (n=10)	'Consumer Desires' cohort (n=10)	'Drug Facts' cohort (n=10)	Total (n=50)
Gender	Male	4	5	5	5	5	24
	Female	6	5	5	5	5	26
Age, years	18-29	3	3	3	3	3	15
	30-49	3	3	2	3	3	14
	50-69	2	3	3	3	3	14
	70+	2	1	2	1	1	7
Highest level of education	Year 10	3	1	2	0	0	6
	Year 12 or College	5	7	5	7	9	33
	Bachelor's degree or higher	2	2	3	3	1	11
Main language spoken at	English	10	8	10	9	9	46
	Other	1 ^a	2	3 ^a	1	1	8

Demographic		Voltaren [®] Rapid 25 cohort (n=10)	'Medicine Information' cohort (n=10)	'Medicine Facts' cohort (n=10)	'Consumer Desires' cohort (n=10)	'Drug Facts' cohort (n=10)	Total (n=50)
Regular use of written	Yes	3	8	5	4	7	27
occupation	No	7	2	5	6	3	23
Country of birth	Australia	4	6	4	8	4	26
	Overseas	6	4	6	2	6	24

^a Participants also specified English as a main language spoken at home (language categories were not mutually exclusive, hence cohort total

340 may exceed 10)

CERTER

Table 3. Summary of the user testing findings for all 5 label formats

		Voltaren®		'Medi	'Medicine		'Medicine		'Consumer		ıg	
User testing questionnaire (UTQ) item		Rapid 25		Informa	Information'		Facts'		Desires'		Facts'	
		(n=1	0)	(n=1	(n=10)		(n= 10)		(n=10)		(n=10)	
		Found	Under-	Found	Under-	Found	Under-	Found	Under-	Found	Under-	
		(n <i>,</i>	stood	(n <i>,</i>	stood	(n,	stood	(n,	stood	(n <i>,</i>	stood	
		difficulty ^a)		difficulty)		difficulty)		difficulty)		difficulty)		
1.	What is the active ingredient found	10 (0)	10	10 (0)	10	10 (0)	10	10 (0)	10	10 (0)	10	
	in [insert diclofenac brand]?											
2.	You are taking [insert diclofenac	10 (0)	9	10 (0)	10	10 (0)	10	10 (0)	10	10 (0)	10	
	brand] to relieve your back pain.											
	How much should you take and how											
	often?											
3.	Pretend that you are pregnant.	10 (0)	9	10 (0)	10	10 (0)	10	10 (0)	10	10 (0)	10	
	After coming home from the											
	pharmacy, you realize you did not											
	tell the pharmacist that you are											
	pregnant at the moment. What											
	should you do?											
4.	How should you store these tablets?	10 (0)	10	10 (0)	10	10 (1)	10	10 (0)	10	10 (0)	10	
5.	Pretend you have already taken SIX	10 (0)	10	10 (1)	10	10 (0)	10	10 (0)	10	10 (0)	10	
	[insert diclofenac brand] tablets so											
	far today for your pain. How many											
	more tablets can you still take											
	today?	Y										

User testing questionnaire (UTQ) item		Voltaren [®] Rapid 25 (n=10)		'Medicine Information' (n=10)		'Medicine Facts' (n= 10)		'Consumer Desires' (n=10)		'Drug Facts' (n=10)	
		Found	Under-	Found	Under-	Found	Under-	Found	Under-	Found	Under-
		(n, difficulty ^a)	stood	(n <i>,</i> difficulty)	stood	(n, difficulty)	stood	(n, difficulty)	stood	(n, difficulty)	stood
6.	Pretend your father has just bought some [insert diclofenac brand] from the pharmacy. He tells you that he forgot to tell the pharmacist that he has a stomach ulcer at the moment. What would you tell your father about taking [insert diclofenac brand]?	10 (0)	10	10 (0)	10		10	10 (0)	10	10 (0)	10
7.	SHOW CARD: A picture of Nurofen® Cold and Flu tablets Active ingredient: Ibuprofen (NSAID anti-inflammatory) Pseudoephedrine (relieves blocked noses) Pretend you are currently taking <i>[insert diclofenac brand]</i> tablets and have just come down with a cold. You have some Nurofen® Cold and Flu tablets at home. What does the box say about taking this medicine together with <i>[insert diclofenac brand]</i> ?	10 (0)	10	10 (0)	10	10 (1)	10	10 (0)	10	10 (2)	10

		Voltare	en®	'Medi	cine	'Medi	cine	'Consu	imer	'Drι	ıg	
User testing questionnaire (UTQ) item		Rapid	25	Informa	Information'		Facts'		Desires'		s'	
		(n=10	0)	(n=1	0)	(n= 1	(n= 10)		(n=10)		(n=10)	
		Found	Under-	Found	Under-	Found	Under-	Found	Under-	Found	Under-	
		(n <i>,</i>	stood	(n,	stood	(n,	stood	(n <i>,</i>	stood	(n <i>,</i>	stood	
		difficulty ^a)		difficulty)		difficulty)		difficulty)		difficulty)		
8.	Imagine you know that your body	10 (1)	10	10 (0)	10	8 (1)	8	8 (2)	8	10 (1)	10	
	reacts badly when you have sucrose.											
	What does the box tell you about											
	whether you can take this											
	medicine?											
9.	What can [insert diclofenac brand]	10 (0)	10	10 (0)	10	10 (0)	10	10 (0)	10	10 (0)	10	
	be used for?											
10.	Pretend you have been taking	10 (5)	7	10 (2)	8	10 (4)	8	10 (3)	10	10 (3)	10	
	[insert diclofenac brand] for about 4											
	days in a row now but the pain has											
	not gone away or improved. What											
	does the box say you should do?											
11.	If you wanted to know more about	10 (1)	10	10 (0)	10	10 (0)	10	10 (0)	10	10 (0)	10	
	this medicine, who can you contact											
	or where can you go?											
12.	What side effects should you look	n/a	n/a	10 (0)	10	10 (0)	10	10 (0)	10	10 (0)	10	
	out for whilst taking [insert	(not on										
_	diclofenac brand]?	label)										
13.	What is the longest amount of time	9 (0)	9	10 (0)	10	10 (0)	10	10 (0)	10	10 (0)	10	
	that this medicine can be used for?	Y										

^a The number of participants who had difficulty finding the information

Label	Design improvements	Content improvements	Wording improvements		
Voltaren®	Re-ordering and/or relocation of information	Addition	Uses		
Rapid 25	 Higher up: Directions for use, "Do not take" section 	 How it will work; common side effects; type of medications it 	 Replace migraine with headache 		
	 Move treatment duration to beginning of "Do not" section or together with action to be taken if 	cannot be used with; specific treatment duration: other	Directions for use		
	symptoms persist	information sources; what	 Dosing interval as 8 hours; 		
	• Group information requiring you to see the doctor together under "Precaution" e.g. allergic reaction,	liquid to take medication with	day as 24 hours (maximum daily dose)		
	if symptoms persist	• Some warnings: statements:	Warnings and/or precautions		
	Other	use only as directed. do not	• Clearer, concise pregnancy		
	 Include a separate box to state the ingredients List and number dosage information 	exceed stated dose, see doctor regarding allergic reaction, prolonged use could be harmful; maximum daily dose	 warning "If symptoms persist, stop medicine and see your doctor" 		
			Headings		
			 "Warnings" instead of "Do not take" 		
'Medicine	Re-ordering and/or relocation of information	Addition	Headings		
Information'	Higher up: Directions for use	• All ingredients	• Reword "Uses"		
	 Lower down: Warnings, Ingredients, all contact information 	Deletion			
	 Allergy information together with "Ingredients" 	 Content repetition; sponsor/contact details 			

Label	Design improvements	Content improvements	Wording improvements
'Medicine	Re-ordering or relocation of information	Addition	Warnings and/or precautions
Facts'	 Higher up: Directions for use, Warnings, Inactive ingredients (after Active ingredient) Lower down: "Do not use", Active ingredient, Uses Combine action to be taken if symptoms persist and maximum treatment duration - include under "How to take" Storage information above Poisons Information Centre Sucrose to "Things to be careful of" 	 When to take in relation to meals; sucrose on back panel; why sucrose is highlighted Deletion Statement about reading leaflet (back panel); other information except website 	 Clearer statement of when to stop taking the medicine Headings "Dosage" instead of "How to take" "Filling up ingredients" instead of "Inactive ingredients"
(Consumar	Other mormation of another panel	Deletion	Hoodings
Desires'	 Higher up: Warnings Lower down: Directions for use, Other information Include maximum duration of use, if symptoms persist, and overdose information together under "What should I be careful of?" Move "Other information" or "Ingredients" to side panel Other White background Ingredients listed in bullet points 	 Statement about reading leaflet (back panel); Uses (just state pain reliever); unnecessary words 	 "Warnings" instead of "Do not use"

Label	Design improvements	Content improvements	Wording improvements
'Drug Facts'	Re-ordering or relocation of information	Addition	Headings
	 Higher up: Directions for use Lower down: Warnings, Active ingredient, Other information Side effects under "Warnings" Move "When using this product" to another panel Other More white background Landscape orientation for back panel Include maximum daily dose in a sentence together with dosage Separate out adults and children and tabulate dosage 	 Sucrose on back panel Elaborate on "at first" (dosage) Warning regarding driving or drinking alcohol whilst using this medicine Deletion Common side effects 	 "Inactive ingredients" instead of "Other ingredients" "Main active ingredient" instead of just "Active ingredient" "Side effects" as a heading When using this product State not to use with other anti-inflammatories and diclofenac-containing medicines together Advise to be aware of side effects
			Directions for use

• Delete "at first" and rephrase dosage

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346 **Consumer perspectives on the label formats**

- 347 Overview- participant label rankings and preferences
- 348 The 'Consumer Desires' label format scored highest (Table 5). In the label ranking
- 349 exercise, it was cited most frequently as the most preferred OTC label format (n=17),
- 350 followed closely by the 'Drug Facts' label (n=15). The 'Medicine Information' label was
- 351 the label least often ranked 1^{st} (most preferred) by participants (n=4).
- 352 The majority of participants were in support of OTC label standardization as a labeling
- 353 strategy. Similar to the rankings, consumers most commonly chose the 'Consumer'
- 354 Desires' or 'Drug Facts' label formats as their favored standardized OTC label format
- 355 for implementation. Conversely, the 'Medicine Information' label format was only
- 356 nominated by a few participants.
- 357 Consumer perspectives on the label formats varied considerably. Differences in factors
- 358 such as perceived usability, visual appeal, use of colour, design, content amount/type,
- and/or order of information influenced consumer label preferences and subsequent
- 360 rankings. The label-specific characteristics mentioned by consumers when comparing
- 361 and ranking labels are the focus herein.
- 362
- 363 Table 5. Tallied points for each label according to the nominated ranks per cohort

	_		User testing	participant	cohorts		
	_	Voltaren®	'Medicine	'Medicine	'Consumer	'Drug	Total
		Rapid 25	Information'	Facts'	Desires'	Facts'	points
		cohort	cohort	cohort	cohort	cohort	per
		(n=10)	(n=10)	(n=10)	(n=10)	(n=10)	label
		<i>Y</i>					format
	Voltaren®	26	25	32	29	27	139
	Rapid 25						
	label						
	'Medicine	27	30	24	27	31	139
	Information'						
Label	label						
format	'Medicine	29	32	33	29	31	154
	Facts' label						
	'Consumer	34	40	37	30	31	172
	Desires'						
	label						
	'Drug Facts'	34	23	26	36	31	150
	label						

364 *'Consumer Desires' label format*

- The majority of participants who ranked the 'Consumer Desires' as their most preferred label (14/17) were aged 18-39 years. Participants liked its visual appeal. The use of color, in particular the contraindications' section presented using red, was frequently mentioned as beneficial in highlighting the information, along with the tick cross pictograph system (utilized to help communicate the indications and contraindications information). Aspects that were liked about the 'Consumer Desires' label format included:
- Directions for use situated higher up, along with its tabulation;
- Both active and inactive ingredients being presented together;
- Distinct sectioning of information within the main label;
- Inclusion of all information on 1 main panel; and
- Use of colloquial language.
- 377 *"The colored one immediately stands out to me because it's got a panel which is red*
- 378 with some crosses which immediately says to me 'Danger, danger. You need to read
- 379 this.' So umm, I think that's, that's quite good." (P42- 'Drug Facts' cohort)
- 380 *"I'm really liking this colored one with the crosses and the ticks. Umm and I like the fact*
- that each heading is contained within its own sort of graphically designed bubble, if
- 382 you like. Umm, [it] makes the information really easy to find. It's sort of like an index on
- 383 the back of the box." (P42- 'Drug Facts' cohort)
- 384 Despite these positives, there were a number of shortcomings. Some participants
- thought that the 'Consumer Desires' label format was too busy; small print, excessive
- 386 color, too much information, and minimal background space were negative
- 387 characteristics raised. The question-style headings were also not favored.

388

390 *'Drug Facts' label format*

- The majority of participants who most preferred the 'Drug Facts' label format (12/15) were 40 years or older. Participants liked the clearer, simple layout, larger font, and the ease with which it could be read. The black print on white was seen to stand out; the use of space was also seen as good. The content was liked (e.g. specification that diclofenac is a NSAID) and the categorization and separation of information made information easy to find.
- 397 Similar proportions of participants nominated the 'Drug Facts' label as the most
- 398 preferred or least preferred label, which has contributed to its slightly lower total point
- 399 score (Table 5). It was perceived as an unappealing, boring, or outdated design.
- 400 Comparisons were made to nutrition labeling or cigarette packaging. Directions for use
- 401 located at the bottom or information located on the side panel were generally not
- 402 favored. Further still, separate areas of information did not stand out, for instance,
- 403 when referring to the label format quickly. Participants also opposed the title "Drug
- 404 Facts" as it "makes it sound like marijuana or something" (P30- 'Medicine Information'
- 405 cohort). Participants expressed mixed feelings regarding the information, black bullet
- 406 points, and the border. The two-column format also affected perceptions on how
- 407 easily the label could be read.
- 408 *"That's just a really bad packaging... Whoever designed that needs to probably go back*409 to design school." (P12- Voltaren[®] Rapid 25 cohort)
- 410 *"I think it's a no no, just 'cause it is very hard to read. It is all black and all. It's not*
- 411 colour coded as this one is. So I don't think this is very helpful." (P21- 'Consumer Desires'
- 412 cohort)
- 413
- 414

415 *'Medicine Facts' label format*

- 416 The 'Medicine Facts' was seen as very similar to the 'Medicine Information' label
- 417 format. The navy blue print was seen as more attractive than black print. The layout
- 418 was seen as easy to read, with good, clear, dark banded headings, some white space,
- 419 bullet points, and sectioning.
- 420 *"It's not an overly complicated box. Like, it's not millions of things going on so that does*
- 421 make it a bit easier to use as well." (P17- 'Medicine Facts' cohort)
- 422 Differing opinions on the amount of information was evident; it was liked but on the
- 423 other hand, also seen as too much. The order of information was commented on,
- 424 where it did not always correspond with consumers' preference or perceived
- 425 importance of information. Furthermore, difficulty locating the dosage was reported; it
- 426 *"breaks up the warnings with 'How to take Viffarol' in the middle and I just feel like it's*
- 427 really random that the directions are here. Like, it kind of gets lost in it." (P02-
- 428 'Medicine Information' cohort). Information included on the side panel was not liked,
- 429 with participants believing that the information could be missed. Font size was disliked
- 430 and the colour was also seen as not sharp enough.
- 431 *"I don't know. It's sort of too much. It's all the same colour and it all blends down*
- 432 together. It's harder to find. You can see it, obviously, but it's harder to find." (P37-
- 433 'Consumer Desires' cohort)

434

- 435 'Medicine Information' label format
- 436 Participants liked the clear, banded headings, clear information, bullet points, and
- 437 grouping of contraindications and precautions information together. The black print on
- 438 white was easier to read for some than the navy blue print. Mixed opinions on font

439 size appropriateness were seen.

- 440 On the other hand, the monochrome design was viewed as unappealing and
- 441 unengaging. Participants generally did not like the order of information; in particular,
- the inclusion of directions for use near the bottom of the label. The amount of
- 443 information was also seen as too much.

- 444 Voltaren[®] Rapid 25 label format
- Participants liked the color (navy blue print), the order of information (specifically, that
- the directions for use were at the top of the label), font size, and the prominence of
- the storage information. The simple design, with only 3 headings utilized, and heading
- 448 style were also liked.
- 449 On the other hand, the Voltaren[®] Rapid 25 label was seen to be lacking in content. It
- 450 was criticized for having lengthy individual dot points or sentences, deficient sectioning
- 451 of information, and an extensive "Do not take"¹⁸ section.
- 452 "It [is] a lot of things to read under one heading, so... I don't find that easy to, you
- 453 know, just go through." (P14- 'Medicine Facts' cohort)
- 454
- 455 General comments on label characteristics
- 456 Consumers generally preferred short headings (although headings adopting a
- 457 question-style or use of laymen terms were also liked on occasion). Overall, core
- 458 information included on 1 main panel (where possible) was preferred. However, of
- 459 those who preferred or were comfortable with splitting information across multiple
- 460 panels, information that was less important, less useful, or less often used could be
- 461 included on a side panel. Where some felt indifferent or did not see inactive ingredient
- 462 information as useful (e.g. if it was not understood or in the absence of allergies),
- 463 others felt that complete information should be provided on the label for the purposes
- 464 of transparency or as a precaution.

465 **Discussion**

466

To the best of the authors' knowledge, this is the first study that has developed and 467 468 tested, using industry-standard user testing, labels based on TGA consultation 469 proposals, and more importantly, alternative ones based on good information design principles and a consumer needs analysis. All developed label formats demonstrated 470 satisfactory usability in accordance with benchmark user testing standards²⁰ and thus, 471 could be considered as candidates for use as standardized OTC label formats. Their 472 usability was also superior to the existing label for Voltaren[®] Rapid 25. Participants 473 supported the standardization of OTC labeling, similar to previous studies.^{14, 15} 474 475 Specifically, the 2 labels most frequently preferred and nominated as the format of 476 choice for standardization were the 'Drug Facts' and 'Consumer Desires' labels. 477 The 'Drug Facts' label was the superior label of the 5 in terms of usability, with all 10 478 participants finding and understanding all key points. This may be due to label aspects such as the larger font size and ample white space integrated into its layout in 479 480 comparison to the other labels, where larger font has been previously associated with improved usability by consumers when answering questions about the information on 481 an OTC label.^{26, 27} In particular, this may explain why all participants user testing the 482 'Drug Facts' label identified that the product contained sucrose (for UTQ item 8), 483 compared to the 'Medicine Facts' or 'Consumer Desires' label formats. On the other 484 hand, on the Voltaren[®] Rapid 25 and 'Medicine Information' labels, only sucrose was 485 specified as the sole additional ingredient rather than a complete list as seen in the 486 487 other labels. This could explain why no issues pertaining to UTQ item 8 were detected when these labels were user tested. Overall, a few consumers in each cohort had 488 difficulty finding the complete indicative answer for UTQ item 10 (actions to be taken 489 in response to persistent pain). This was due to the relevant information being located 490 in more than 1 label section. Thus, consolidating this information together in 1 section 491 is a potential target for future label optimization. 492

Consumer preferences with respect to OTC labels can vary with differences exhibited 494 in label characteristics, such as ordering of information²⁸ and design aspects such as 495 print size and spacing,²⁹ which were also aspects commented on by the study 496 participants. However, with respect to the 'Drug Facts' and 'Consumer Desires' labels, 497 participant feedback received in the present study suggest a degree of consistency in 498 specific label characteristics favored by consumers- for example, the suggested use of 499 red to convey warnings¹⁴ and support for the 'Drug Facts' label¹⁵ as identified in the 500 501 initial consumer needs analysis. Furthermore, suggested improvements mirrored some received in the consumer needs analysis, especially if the label format they user tested 502 did not display these characteristics e.g. further use of bolding and color, inclusion of 503 directions for use higher up, and active ingredient lower down in the label.¹⁴ This order 504 of information and use of red to highlight the contraindications were all characteristics 505 506 of the 'Consumer Desires' label. On the contrary, the 'Medicine Information', the Australian TGA format proposed in 2014,¹² achieved the lowest total point score and 507 508 was nominated least often as the chosen standardized format to be implemented. 509 When considering usability in tandem with consumer preferences and feedback given as part of the present study, a hybrid of the 'Consumer Desires' and 'Drug Facts' labels 510 511 could be considered for use as an OTC standardized label format for implementation 512 by countries seeking to adopt a label standardization strategy. Aspects of each label 513 could address the perceived shortcomings of the other across different demographics (as these 2 labels were the most different from each other). For instance, in terms of 514 specific characteristics, the 'Drug Facts' label could be amended to reflect the order of 515

information on the 'Consumer Desires' label; other aspects such as the moderate use
of color (e.g. the red used for warnings information was liked) and use of the tick cross
pictograph system could also improve its visual appeal. The larger font size and ample

519 white space should also be retained as these are aspects of good information design.⁴

521 With regards to standardization as a labeling strategy, a one-size-fits-all approach will inherently have its limitations in its ability to satisfactorily cater for the needs of the 522 entire consumer population. Consumer preference may not always equate to a label 523 524 that actually performs well, as was evident in the diversity of participant perspectives on the 5 study label formats. For instance, user testing demonstrated that the active 525 526 ingredient could still be found even if not presented initially at the top of the label. Thus, the present study does not provide evidentiary support of an advantage in 527 528 including the ingredients foremost, particularly when consumers generally do not prefer this approach, as voiced in both the present and previous^{8, 14, 28} studies. 529 Importantly, usability must remain the focal point for improvement of OTC labeling 530 quality as OTC label information may not be adequately understood and can be 531 inappropriately acted upon.³⁰⁻³² It is imperative to consult consumers in the written 532 medicine information development process as by doing so, targets for improvement of 533 OTC medicine information can be identified.³³⁻³⁶ Interestingly, Bix et al.³⁷ 534 535 demonstrated that adherence to labeling requirements embedded in standardized 536 labeling regulations, such as those stipulated for the Drug Facts label, may still yield variations in the legibility of label formats. In addition, a recent study conducted in the 537 U.S. by Bhansali et al.³⁸ noted that almost 80% of participants most preferred an 538 alternative label format that included directions near the top of the label and warnings 539 information lower down. In comparison, only approximately 14% most preferred the 540 Drug Facts label format i.e. the order of information.³⁸ Since requirements for 541 standardized tabulation of information on OTC labels have now been formally 542 published in both Australia and Canada (after the present study had been 543 concluded),^{39, 40} this reinforces that ongoing research is important and necessary to 544 ensure that standardization promotes the development of improved OTC labels for 545 consumers. With standardized labeling, there is a risk of implementing a policy 546 centered on an OTC label format that is not preferred by consumers, for whom the 547 benefits are intended, or that would not yield optimal usability. Considering that all 548 549 evidence-based label formats for the same exemplar medicine in the present study 550 demonstrated comparable usability on the whole, this also brings into question the overall advantage of implementing a standardized label format in terms of usability. 551

552 At present, user testing of OTC medicine information is not required by law in Australia and is not routinely used to evaluate written medicine information.⁴¹ As legislation 553 places emphasis on the content required for inclusion on labels,⁴² usability of existing 554 555 OTC labels in regulatory contexts such as Australia remains largely unknown. Thus, future research on the impact of these labeling changes is critical and should feed into 556 an iterative, consumer-centric user testing process for label optimization, as embodied 557 in previous OTC label user testing studies.^{34, 35} Moreover, there are no legislated 558 559 requirements in the U.S. for the user testing of all OTC labels; instead, guidelines are available which describe how testing of OTC labels can be conducted.⁴³ This lack of 560 mandated user testing may have implications on the quality of standardized OTC 561 labels. Accordingly, a move towards legislating user testing may allow for more 562 563 innovative labeling strategies that demonstrate superior usability to a standardized 564 format. This may also more effectively take into account both consumer and manufacturer perspectives on OTC labeling. 565

566

567 Study limitations

This study has some limitations. It is acknowledged that the involvement of other 568 569 experts, for instance, in the area of functional linguistics, would be useful to assist in label development. The options for label design are effectively unlimited in many 570 571 ways, depending on how written medicine information developers opt to manipulate 572 different parameters. Accordingly, in the present study, there was a pragmatic limitation on the number of label designs included for user testing which meant that 573 not all possible label formats and combinations could be explored. In light of this, a 574 range of different label characteristics was integrated across the different label 575 formats. Also, the same packaging dimensions were used for all the developed label 576 577 formats for consistency as they were developed for the same fictitious branded 578 product. Thus, findings may differ if packaging size was altered. Optimal product-579 specific labeling that meets the relevant requirements for standardization should also 580 be evaluated by other key stake-holders in addition to consumers, such as 581 pharmaceutical manufacturers. However, it is imperative to ensure that compromises are not made to the labels that will have an adverse impact on medication safety. 582

583 Conclusions

584

585 All alternative OTC label formats developed and user tested in this study were 586 effective in communicating key information overall and demonstrated better usability 587 than the existing Voltaren[®] Rapid 25 comparator label format. This then highlights the 588 effectiveness of implementing good information design principles in OTC label 589 development and the need to improve existing OTC labeling. The satisfactory usability of these labels also emphasizes that consumer preferences can be utilised to help 590 guide label development without compromising OTC label usability. Differences in 591 factors such as design, content, and wording impacted both participants' actual and 592 593 perceived usability of the OTC label formats. As the TGA proposed 'Medicine Information' label format was least often nominated 594 595 by participants as their preferred standardized OTC label format for implementation, 596 this reinforces the importance of consulting consumers as key stakeholders in working towards the implementation of regulatory changes such as OTC label standardization. 597 598 Aspects of the 'Consumer Desires' and 'Drug Facts' labels can be taken forward in refining the design of a standardized OTC label format that could be adopted in future, 599 600 in line with both consumer preferences and usability testing data. In light of the recent 601 introduction of new OTC medicine labeling policies that facilitate standardization in Australia, this study provides evidence in support of the advantages for adoption of a 602 mandate for user testing to also be integrated into OTC labeling frameworks in future 603 to evaluate and ensure label usability. 604

605

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620	Refe	rences		
621				
622	1.	Tong V, Raynor DK, Aslani P. Design and comprehensibility of over-the-counter		
623		product labels and leaflets: a narrative review. Int J Clin Pharm 2014;36:865-		
624		872.		
625	2.	Communication Research Institute of Australia. Labelling Code of Practice:		
626		Designing Usable Non-Prescription Medicine Labels for Consumers. Canberra,		
627		Australia: Communication Research Press; 2004.		
628	3.	Medicines and Healthcare Products Regulation Agency. Best Practice Guidance		
629		on the Labelling and Packaging of Medicines. UK: Medicines and Healthcare		
630		Products Regulation Agency; 2012.		
631	4.	Raynor DK, Dickinson D. Key principles to guide development of consumer		
632		medicine information—content analysis of information design texts. Ann		
633		Pharmacother 2009;43:700-706.		
634	5.	Sansgiry SS, Shringarpure G. Manufacturers' compliance with the US Food and		
635		Drug Administration's over-the-counter human drugs: labeling requirements.		
636		Packag Technol Sci 2003;16:91-98.		
637	6.	Sansgiry SS, Cady PS, Patil S. Readability of over-the-counter medication labels.		
638		J Am Pharm Assoc (Wash) 1997;NS37:522-528.		
639	7.	Department of Health and Human Services Food and Drug Administration.		
640		Over-the-counter human drugs; labeling requirements. Fed Regist		
641		1999;64:13254-13303.		
642	8.	Aikin KJ. Consumer Comprehension and Preference for Variations in the		
643		Proposed Over-the-Counter Drug Labeling Format: Final Report. Bethesda, MD:		
644		U.S. Food and Drug Administration Center for Drug Evaluation and Research;		
645		1998.		
646	9.	Mendat CC, Watson AM, Mayhorn CB, Wogalter MS. Age differences in search		
647		time for two over-the-counter (OTC) drug label formats. Proc Hum Fact Ergon		
648		Soc Annu Meet 2005;49:200-203.		

649	10.	Shaver EF, Wogalter MS. A comparison of older vs. newer over-the-counter
650		(OTC) nonprescription drug labels on search time accuracy. Proc Hum Fact
651		Ergon Soc Annu Meet 2003;47:826-830.
652	11.	Australian Government Department of Health and Ageing Therapeutic Goods
653		Administration. TGA Medicine Labelling and Packaging Review: Consultation
654		Paper Version 1.0 May 2012. Australian Capital Territory: Therapeutic Goods
655		Administration; 2012.
656	12.	Australian Government Department of Health and Ageing Therapeutic Goods
657		Administration. Guideline for the Labelling of Medicines: Draft- Version 1.0,
658		August 2014. Australian Capital Territory: Therapeutic Goods Administration;
659		2014.
660	13.	Health Canada, Institute for Safe Medication Practices Canada. Document for
661		Industry: Draft Good Label and Package Practices Guide. Canada: Health
662		Canada; 2015.
663	14.	Author citation. 2016.
664	15.	Author citation. 2016.
665	16.	Australian Government Department of Health and Ageing Therapeutic Goods
666		Administration. Submissions Received: Medicine Labelling,
667		https://www.tga.gov.au/submissions-received-medicine-labelling. Updated
668		October 23 2015. Accessed 23.07.16.
669	17.	Sless D, Shrensky R. Writing About Medicines for People: Usability Guidelines
670		for Consumer Medicine Information. 3rd ed. Sydney, Australia: Australian Self-
671		Medication Industry; 2006.
672	18.	Voltaren® Rapid 25 (10 tablets): Novartis Consumer Health Australasia Pty Ltd;
673		n.d.
674	19.	Voltaren® Rapid 25 [package insert]. Mulgrave, VIC: Novartis Consumer Health
675		Australasia Pty Ltd; 2008.

676	20.	Raynor DK, Knapp P, Silcock J, Parkinson B, Feeney K. "User-testing" as a
677		method for testing the fitness-for-purpose of written medicine information.
678		Patient Educ Couns 2011;83:404-410.
679	21.	Raynor DK. User testing in developing patient medication information in
680		Europe. Res Soc Adm Pharm 2013;9:640-645.
681	22.	Aslani P, Hamrosi K, Feletto E, et al. Investigating Consumer Medicine
682		Information (I-CMI) Project. Sydney, Australia: The Pharmacy Guild of Australia,
683		Australian Government Department of Health and Ageing; 2010.
684	23.	Green J, Thorogood N. Qualitative Methods for Health Research. 3rd ed.
685		London: Sage Publications; 2014.
686	24.	Miles MB, Huberman AM. Qualitative Data Analysis: An Expanded Sourcebook.
687		2nd ed. Thousand Oaks, CA: Sage Publications; 1994.
688	25.	Vojnović M. Rating Systems. In: Vojnović M. Contest Theory: Incentive
689		Mechanisms and Ranking Methods. Cambridge, UK: Cambridge University
690		Press; 2015:501-562.
691	26.	Wogalter MS, Vigilante WJ Jr. Effects of label format on knowledge acquisition
692		and perceived readability by younger and older adults. Ergonomics
693		2003;46:327-344.
694	27.	Murty S, Sansgiry SS. Consumer comprehension of OTC medication labels and
695		the scope for improvement in font size. <i>J Pharm Technol</i> 2007;23:207-213.
696	28.	Vigilante WJ Jr, Wogalter MS. The preferred order of over-the-counter (OTC)
697		pharmaceutical label components. Drug Inf J 1997;31:973-988.
698	29.	Vigilante WJ Jr, Wogalter MS. Over-the-counter (OTC) drug labeling: format
699		preferences. Proc Hum Fact Ergon Soc Annu Meet 1999;43:103-107.
700	30.	Lokker N, Sanders L, Perrin EM, et al. Parental misinterpretations of over-the-
701		counter pediatric cough and cold medication labels. Pediatrics 2009;123:1464-
702		1471.
703	31.	Patel VL, Branch T, Arocha JF. Errors in interpreting quantities as procedures:
704		the case of pharmaceutical labels. Int J Med Inform 2002;65:193-211.

705	32.	Simon H, Weinkle D. Over-the-counter medications: do parents give what they
706		intend to give? Arch Pediatr Adolesc Med 1997;151:654-656.
707	33.	Pires CM, Cavaco AM. Exploring the perspectives of potential consumers and
708		healthcare professionals on the readability of a package insert: a case study of
709		an over-the-counter medicine. <i>Eur J Clin Pharmacol</i> 2014;70:583-588.
710	34.	Sless D, Tyers A. Medicine Labelling for Consumers. Australia: Communication
711		Research Institute of Australia; n.d.
712	35.	Rogers D, Shulman A, Sless D, Beach R. Designing Better Medicine Labels:
713		Report to PHARM. Australia: Communication Research Institute of Australia;
714		1995.
715	36.	Dickinson D, Raynor DK, Duman M. Patient information leaflets for medicines:
716		using consumer testing to determine the most effective design. Patient Educ
717		Couns 2001;43:147-159.
718	37.	Bix L, Lockhart H, Cardoso FF, Selke SE. Testing the FDA's mandate for over-the-
719		counter medication labels. J Pharm Mark Manage 2003;15:17-36.
720	38.	Bhansali AH, Fleming ML, Sherer JT, Sansgiry SS. Improving information
721		processing: the effect of label format among current and potential over-the-
722		counter medication users. Ther Innov Regul Sci 2016;50:560-568.
723	39.	Australian Government Department of Health Therapeutic Goods
724		Administration. Medicine Labels: Guidance on TGO 91 and TGO 92 Version 1.0,
725		August 2016. Australian Capital Territory: Therapeutic Goods Administration;
726		2016.
727	40.	Health Canada. Good Label and Package Practices Guide for Non-Prescription
728		Drugs and Natural Health Products. Canada: Health Canada; 2016.
729	41.	Jay E, Aslani P, Raynor DK. User testing of consumer medicine information in
730		Australia. Health Educ J 2011;70:420-427.
731		

732	42.	Therapeutic Goods Order No. 69 - General Requirements for Labels for	
733		Medicines as Amended, Australia,	
734		https://www.legislation.gov.au/Details/F2014C00926. Published July 14 2014.	
735		Accessed 23.07.16.	
736	43.	U.S. Department of Health and Human Services Food and Drug Administration	
737		Center for Drug Evaluation and Research. Guidance for Industry: Label	
738		Comprehension Studies for Nonprescription Drug Products. Silver Spring, MD:	
739		U.S. Department of Health and Human Services Food and Drug Administration	

- 740 Center for Drug Evaluation and Research; 2010.
- 741

743 Figure captions

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- 745 Figure 1. 'Medicine Information' label format
- 746 Figure 2. 'Drug Facts' label format
- 747 Figure 3. 'Medicine Facts' label format
- 748 Figure 4. 'Consumer Desires' label format
- 749 Figure 5. Complete "Viffarol" packaging for the 'Medicine Information' label format
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Appendix 1. Semi-structured interview protocol questions		
Semi-structured interview protocol sections	Questions	
Perspectives on the user tested label	 Firstly, what are your overall thoughts about the box that yo just helped us test, in terms of how easy/hard it is to read ar the information that is included on it? Looking at the information on the box, what do you think about the amount of information that it contains? What do you think about the layout of the information on th box? Thinking back to how you used the box to answer the questions before, what information was easy or difficult to find and/or understand? From your point of view, how can we improve the box in the future to improve its readability and how well it is understood? 	
Perspectives on all other label formats	 Firstly, what are your overall thoughts about these boxes, in terms of how easy/hard it is to read and the information that is included on it? What do you think about the amount of information that ear of these boxes contain? What do you think about the layout of the information on the boxes? What do you think about the headings used on these boxes? What do you think about how the information is ordered on these boxes? What do you think about how colour has been used on these boxes? What do you think can be improved with these boxes to mal them better in the future? 	
Label format rankings	 How would you rank all the boxes, from the one you most preferred to the least preferred? Why did you rank them in this way? 	
Standardization- preferred label format	 If we had to choose a standard back of the pack for all over- the-counter medicines, which would you choose out of the 5 and why? How would you feel if this was the one we rolled out onto al over-the-counter medicines in Australia? Taking a step back from the boxes in front of you, what do you think about having standardised back of the packs/boxe for all over-the-counter medicines? 	

Medicine Information

Ingredients

Each tablet contains the active ingredient: Diclofenac potassium 25mg. Also contains sucrose.

Uses

Short term relief of pain and swelling related to: migraines • back • joints • period pain • sprains and strains

Warnings

Do not use if

- You are pregnant
- You have heart failureYou have kidney problems
- You are less than 14 years old

You have a stomach ulcer or other stomach or bowel problems

- You are allergic to any of the ingredients, or other anti-inflammatory medicines like aspirin
 While using this product

- Do not take this product together with other anti-inflammatory medicines

- anu-iminaminatory medicines Do not take other medicines that also contain diclofenac Common side effects: feeling sick, stomach upset, feeling dizzy Call the Poisons Information Centre (13 11 26) or go to the hospital straight away if you have taken too much
- Talk to your doctor or pharmacist if your problems get worse or do not get better
 For more information: 02 9000 5000 (Aus) or visit www.viffarol.com.au

Directions for use

Adults and children older than 14 years: Take 2 tablets at first and then take 1 or 2 tablets every 8 hours if needed

- Do not take more than 8 tablets in 24 hours
- Do not take for more than 3 days at a time. Check with your doctor before taking for any longer.

Other information

Store in a cool, dry place at room temperature (below 30°C) Supplied by PharmVT Consumer Health Australasia Pty Ltd, 100-150 Parkside Road, NSW 2006, Australia. Phone: 02 9000 5000. NZ Office: Auckland, New Zealand. Phone 09 300 5000.

Drug Facts		Drug Facts
Active ingredient (in each tablet) Diclofenac potassium 25mg (NSAID)*	Purpose Anti-inflammatory pain reliever	Communed) Other information Store in a cool, dry place at room temperature (below 30°C)
Uses Short term relief of pain and ■ migraines ■ back ■ joint ■ sprains and strains	swelling related to: s ■ period pain	Inactive ingredients Silica colloidal anhydrous, calcium phosphato, magnacium
Warnings Do not use if You are pregnant You have heart failure You have kidney problems You are less than 14 years old	 You have a stomach ulcer or other stomach or bowel problems You are allergic to any of the ingredients, or other anti-inflammatory 	prospirate, magriesium stearate, starch-maize, povidone, sodium starch glycollate, cellulose- microcrystalline, iron oxide red C177491, macrogol 8000, sucrose , talc-purified, titanium dioxide
When using this product	Call the Beissere	Questions? 02 9000 5000 (Aus) or visit www.viffarol.com.au
 Do not take with other anti-inflammatory medicines Do not take other medicines that also contain diclofenac Common side effects: feeling sick, stomach upset, feeling dizzy 	 Call the for Solis Information Centre (13 11 26) or go to the hospital straight away if you have taken too much Talk to your doctor or pharmacist if your problems get worse or do not get better 	
Directions Adults and children older at first and then take 1 or 2 needed Do not take more than 8 ta Do not take for more than Check with your doctor be	than 14 years: Take 2 tablets 2 tablets every 8 hours if ablets in 24 hours 3 days at a time. fore taking for any longer.	

Medicine Facts

Please read the Medicine Information Leaflet inside the pack before using Viffarol. Active ingredient Purpose

Each Viffarol tablet contains: Anti-Diclofenac potassium 25mg (NSAID)* inflammatory *non-steroidal anti-inflammatory drug pain reliever. Anti-inflammatory Uses

Short term relief of pain and swelling related to migraines, back, joints, period pain, or sprains and strains.

- Do not use Viffarol if:
- You are pregnant
- You have heart failure
 You have kidney problems
 You are less than 14 years old
- You have a stomach ulcer or other stomach or bowel
- You are allergic to any of the ingredients in Viffarol, or other anti-inflammatory medicines like aspirin
- How to take Viffarol

Adults and children older than 14 years:

- Take 2 tablets at first.
- Then take 1 or 2 tablets every 8 hours if needed.
- Do not take more than 8 tablets in 24 hours. Do not take Viffarol for more than 3 days at a time. Check with your doctor before taking for any longer.

Things to be careful of when taking Viffarol

- Do not take Viffarol together with othe anti-inflammatory medicines.
- Do not take other medicines that also contain diclofenac.
- Common side effects: feeling sick, stomach upset,
- Tolk to your doctor or pharmacist if your problems get worse or do not get better.

Other information

Call the Poisons Information Centre (13 11 26) or go to the hospital straight away if you have taken too much. For more information: 02 9000 5000 (Aus) or visit www.viffarol.com.au Store in a cool, dry place at room temperature (below 30°C)

Viffarol 25 mg

Inactive ingredients

Inactive ingredients Silica colloidal anhydrous, calcium phosphate, magnesium stearate, starch-maize, povidone, sodium starch glycollate, cellulose-microcrystalline, iron oxide red C177491, macrogol 8000, **sucrose**, talc-purified, titanium dioxide

Please read the Medicine Information Leaflet inside the pack before using Viffarol.	
 What is Viffarol used for? Short term relief of pain and swelling related to migraines, back, joints, period pain, or sprains and strains. 	
How do you take Viffarol?	
Adults and children older than 14 years Do not take Viffacel for 2 tablets every 8 hours if needed. Do not take more than 8 tablets in 24 hours.	
Check with your doctor before taking for any longer.	
Do not use Viffarol if you:	
 X Are pregnant X Have heart failure X Have kidney problems X Are less than 14 years old X Have kidney problems X Are allergic to any of the ingredients in Viffarol, or other arth-inflammatory medicines like aspirin 	
What should I be careful of when taking Viffarol?	
 X Do not take Viffarol together with other anti-inflammatory medicines. X Do not take other medicines that also contain diclofenac. Common side effects: feeling sick, stomach upset, feeling dizzy. Talk to your doctor or pharmacist if your problems get worse or do not get better. 	
Other information	
Call the Poisons Information Centre (13 11 26) or go to the hospital straight away if you have taken too much. For more information: 02 9000 5000 (Aus) or visit www.viffarol.com.au Store in a cool, dry place at room temperature (below 30° C)	
What are the ingredients in Viffarol?	
Active ingredient: Each Viffarol tablet contains Diclofenac potassium 25mg Inactive ingredients: silica colloidal anhydrous, calcium phosphate, magnesium stearate, starch-maize, povidnoae, codum ctarch durollata collulose.	

povidone, sodium starch glycollate, cellulosemicrocrystalline, iron oxide red C177491, macrogol 8000, **sucrose**, talc-purified, titanium dioxide



Developing alternative over-the-counter medicine label formats: how do

they compare when evaluated by consumers?

Highlights

- Four alternative label formats for diclofenac were developed with consumer input in response to proposed changes to Australian over-the-counter (OTC) medicine labeling legislation.
- All label formats demonstrated good usability, superior to that for an existing OTC diclofenac label.
- Consumers expressed diverse opinions on the label formats' design and content.
- The proposed Therapeutic Goods Administration's (TGA) standardized label format was only "most preferred" by 4 out of 50 consumers in total.
- Both user testing data and consumer perspectives reinforced the need to optimize the TGA proposed standardized label format.