

Background

This project was inspired by the announcement that the FDA released a batch of 89 Complete Response Letters (CRLs) they issued in response to new drug and biologic applications that did not receive approval. The CRLs released pertained to actions taken by the Agency between January 12, 2024 and August 18, 2025. The announcement was made on September 4, 2025 on the following website, which includes a link to the letters:

<https://www.fda.gov/news-events/press-announcements/fda-announces-real-time-release-complete-response-letters-posts-previously-unpublished-batch-89>

Overview

I reviewed all 89 letters to educate myself on recent regulatory non-approval actions. To assess trends, I created an EXCEL spreadsheet capturing key information in those letters. Then I created plots in R of the data and looked for patterns. I summarized my findings in informal posts to LinkedIn. The data used, code for plotting, plots, and LinkedIn posts are provided here.

Everything shared and discussed here is based only on publicly-available information. If the information wasn't directly available in a letter, it was obtained from an Internet search.

Contents

Filename	Description
CRLs-NonAppr-FDARelease-04Sept2025.xlsx	EXCEL file of metadata on the 89 CRLs.
CRLData_KeyToVariables.pdf	Key to variables in the above EXCEL file.
RcodeWithPlots.pdf	Code to recreate plots, with plots shown.
ProjectOverview.pdf	Linked In post describing the project.
WhyTheseLettersMatter.pdf	LinkedIn post describing the significance of FDA's release of the CRLs for unapproved products.
ClinPharmEarnsAminus.pdf	LinkedIn post tallying Clinical Pharmacology issues in CRLs.
IsFailureAGoodSign.pdf	LinkedIn post tallying CRL issues by Therapeutic Area.
LocationOfCompaniesInCRLs.pdf	LinkedIn post tallying CRL issues by location of company headquarters.
NumberOfPagesInCRL.pdf	LinkedIn post tallying number of pages in CRLs.
ClinPharmIssuesInApproval.pdf	LinkedIn post summarizing the Clin Pharm approval issues in the CRLs.
ClinPharmCommentsInCRLs.pdf	LinkedIn post summarizing trends in comments in CRLs that were not approval issues.
WillYouNeedMoreClinicalData.pdf	LinkedIn post discussing the situation in which a drug is not approved for clinical issues but additional clinical data are not needed.
AcceleratedApprovalAfterFailure.pdf	LinkedIn post discussing submissions which were to pursue accelerated approval after the data failed to support standard approval.