

**PharmaSUG 2026**  
**Paper for Presentation 163**  
**Current Review of Open Source in New Drug Applications: R & Python**

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## Abstract

I started a list of submissions that use open source in 2023. I maintain the list at:

- a. <https://github.com/philbowsher/Open-Source-in-New-Drug-Applications-NDAs-FDA>

The 2026 analysis documents the increased prevalence of R within New Drug Applications and its integration into the submission process, while Python appears with lower frequency. The current landscape indicates that open-source software is utilized as a primary tool for both Sponsor analytic submissions and FDA independent reviewer assessments.

## Introduction

### 1. Key Takeaways: Open-Source-in-New-Drug-Applications-NDAs-FDA

- A. 'Clinical Data Scientist': A formalized role within the Agency dedicated to R-based exploration and independent safety analysis.  
[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2026/761458Orig1s000MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2026/761458Orig1s000MultidisciplineR.pdf)  
2026 GlaxoSmithKline "The clinical data scientist performed an independent safety analysis using R Studio version 4.1.0. " "Source: adex.xpt and adsl.xpt; Software: R "
- B. Regulatory Acceptance of Open Source Environments  
[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2025/125504Orig1s063.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2025/125504Orig1s063.pdf)  
2025 Novartis Pharmaceuticals Corporation. "For dataset creation, data manipulation, data presentation, construction of plots and logistic regression analyses, R version 3.6.2 and/or version 4.1.3 (the R Foundation for Statistical Computing) was used. Acceptable"  
  
[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2025/761352Orig1s000MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2025/761352Orig1s000MultidisciplineR.pdf)  
2025 Merus N.V. "R (Version 4.2.1, The R foundation for Statistical Computing). Rstudio (version 2022.07.1, RStudio Inc, Boston, USA)." "Acceptability [FDA's comments] Acceptable"  
  
[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2025/219042Orig1s000AdminCorres.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2025/219042Orig1s000AdminCorres.pdf)  
2025 Boehringer Ingelheim Pharmaceuticals, Inc. "In regard to FDA's comments #22a-c, Boehringer Ingelheim followed....csv file for datasets, .pdf file for define file, and .mod or .R or .lst file for modeling files." "Question 22a – c: FDA stated that the data format was generally acceptable."
- C. OCS Analysis Studio used by FDA in reviews.  
Built with R, Shiny, JavaScript, [D3.js](#)  
<https://www.fda.gov/media/171317/download>
- D. R's popularity in PK  
[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2024/218213Orig1s001.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2024/218213Orig1s001.pdf)

2024 Bristol Myers Squibb Company "R (Version 3.6.1 or later); Xpose and PsN (Department of Pharmacy, Uppsala University, Uppsala, Sweden); Pirana (Version 2.9.1); R (Version 3.6.3 or above; R Foundation for Statistical Computing, Vienna, Austria); RStudio (Version 1.2.5033; RStudio, Boston, MA, USA)" "Yes, FDA agrees that the software and their versions used to conduct the analyses are acceptable. Standard software were used for conducting the PopPK analysis."

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2024/218944Orig1s000MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2024/218944Orig1s000MultidisciplineR.pdf)

2024 Syndax Pharmaceuticals, Inc. "The statistical reviewer's analyses were performed using R 4.0.5 (The R Foundation, <https://www.rproject.org/>)." "R (Version 4.0.0 or higher) for simulations, graphs, and data manipulations."

E. Use of RMD

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2025/219876Orig1s000MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2025/219876Orig1s000MultidisciplineR.pdf)

2025 Chimerix, Inc. "Source: CHIM-ONC201\_diagnostics\_run315.Rmd""Source: Chimerix\_ONC201\_ForestPlot\_2024.R"

F. Large Pharmas

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2026/761458Orig1s000MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2026/761458Orig1s000MultidisciplineR.pdf)

2026 GlaxoSmithKline "The clinical data scientist performed an independent safety analysis using R Studio version 4.1.0. " "Source: adex.xpt and adsl.xpt; Software: R "

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2025/219208Orig1s000IntegratedR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2025/219208Orig1s000IntegratedR.pdf)

2025 Novartis Pharmaceuticals "Source: Reviewer's analysis based on adsl.xpt; Software: R"

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2025/761400Orig1s000MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2025/761400Orig1s000MultidisciplineR.pdf) 2025 Regeneron Pharmaceuticals, Inc. "and Rstudio"

G. Broad Use

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2024/218944Orig1s000MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2024/218944Orig1s000MultidisciplineR.pdf)

2024 Syndax Pharmaceuticals, Inc. "The statistical reviewer's analyses were performed using R 4.0.5 (The R Foundation, <https://www.rproject.org/>)." "R (Version 4.0.0 or higher) for simulations, graphs, and data manipulations."

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2024/213586Orig1s000MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2024/213586Orig1s000MultidisciplineR.pdf)

2024 Teva Neuroscience Inc. "Primary analysis and plotting were performed in R 4.1.2. "

H. Roche Complete Open Source Analytic Pipeline and Compound Acceptance

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2024/219249Orig1s000MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2024/219249Orig1s000MultidisciplineR.pdf)

2024 Genentech Inc. "were performed using R® V4.2 (or higher) with comprehensive R archive network (CRAN)"

<https://www.fda.gov/drugs/resources-information-approved-drugs/fda-approves-inavolisib-palbociclib-and-fulvestrant-endocrine-resistant-pik3ca-mutated-hr-positive>

<https://www.youtube.com/watch?v=4YpKAaI5WUU>

[https://phuse.s3.eu-central-1.amazonaws.com/Archive/2024/Connect/EU/Strasbourg/PAP\\_SA02.pdf](https://phuse.s3.eu-central-1.amazonaws.com/Archive/2024/Connect/EU/Strasbourg/PAP_SA02.pdf)

[https://phuse.s3.eu-central-1.amazonaws.com/Archive/2024/Connect/EU/Strasbourg/PRE\\_SA02.pdf](https://phuse.s3.eu-central-1.amazonaws.com/Archive/2024/Connect/EU/Strasbourg/PRE_SA02.pdf)

<https://www.gene.com/media/press-releases/15011/2023-12-04/genentech-announces-positive-phase-iii-r>

I. Some Python

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2025/219792Orig1s000IntegratedR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2025/219792Orig1s000IntegratedR.pdf)

2025 UCB INC "Source: adsl.xpt; Software: R" "and Python software"

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2025/022137Orig1s015MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2025/022137Orig1s015MultidisciplineR.pdf)  
2025 022137 Label Change "identified through a python-based tool"

J. R Software Version Variance

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2026/761458Orig1s000MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2026/761458Orig1s000MultidisciplineR.pdf)  
2026 GlaxoSmithKline "The clinical data scientist performed an independent safety analysis using R Studio version 4.1.0. " "Source: adex.xpt and adsl.xpt; Software: R "

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2025/219839Orig1s000MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2025/219839Orig1s000MultidisciplineR.pdf)  
2025 Dizal (Jiangsu) Pharmaceutical Co Ltd. "R (Version 4.2.3)"

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2025/125504Orig1s063.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2025/125504Orig1s063.pdf)  
2025 Novartis Pharmaceuticals Corporation. "For dataset creation, data manipulation, data presentation, construction of plots and logistic regression analyses, R version 3.6.2 and/or version 4.1.3 (the R Foundation for Statistical Computing) was used. Acceptable"

K. Package Source and Integrity: Documentation indicates Agency acceptance of the Comprehensive R Archive Network (CRAN) as a standard repository for analysis packages.

[https://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2024/219249Orig1s000MultidisciplineR.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/nda/2024/219249Orig1s000MultidisciplineR.pdf)  
2024 Genentech Inc. "were performed using R® V4.2 (or higher) with comprehensive R archive network (CRAN)"

<https://cran.r-project.org/web/packages/adaptIVPT/index.html> 2024-01-26

Package provides procedures based on parallel replicate design and balanced data, according to the U.S. Food and Drug Administration's "Draft Guidance on Acyclovir"

[https://www.accessdata.fda.gov/drugsatfda\\_docs/psg/Acyclovir\\_topical%20cream\\_RLD%2021478\\_RV12-16.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/psg/Acyclovir_topical%20cream_RLD%2021478_RV12-16.pdf)

Maintained by FDA

## Conclusion

This paper highlights R's use in submissions in NDAs by both sponsors and reviewers. These are current trends applicable for statistical programmers. The information outlined in this paper highlights the evolving space of using open source for submissions.

## CONTACT INFORMATION

Your comments and questions are valued and encouraged. Contact the author at:

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