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Blip Or Trend? FDA Guidance Fell Off Steeply In 2025

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[Judith L. O'Grady](#)

Judy O'Grady, a partner in Troutman Pepper Locke's Health Care + Life Sciences Industry Group, was quoted in the January 13, 2026 *Law360* article, "[Blip Or Trend? FDA Guidance Fell Off Steeply In 2025](#)."

"They have fewer people — far fewer people," said Judith O'Grady, a partner at [Troutman Pepper Locke LLP](#) and leader of its FDA regulatory team. "Issuing guidance documents is one thing that can kind of take a back seat when other things, like reviewing applications, really can't."

The changes, she said, have made the agency less predictable.

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Without guidance, "there's more unpredictability, and certainly we've seen a lot of increased unpredictability with this FDA that's concerning to everyone in the industry," Troutman's O'Grady said.

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