

December 12, 2025

To: New Jersey Department of Community Affairs – Commissioner Jacquelyn A. Suárez, Chief of Staff Kia King; Assistant Commissioner and Director, Division of Housing and Community Resources Janel Winter; Assistant Director, Division of Housing and Community Resources Sheri Malnak

From: Lead-Free NJ Collaborative Steering, Advocacy, and Housing Committee Chairs

Lead-Free NJ Applauds LRAP Progress Thus Far, Expresses Concern about Program Restrictions Hindering LRAP Obligation Spenddown

Lead-Free NJ applauds Governor Murphy's historic investment of \$180 million in American Rescue Plan Act (ARPA) Funds for lead remediation and abatement across the state, through the New Jersey Department of Community Affairs (DCA) Lead Remediation and Abatement Program (LRAP). LFNJ commends the efforts of the DCA team and 50+ LRAP agencies to remediate and abate nearly 2,000 housing units thus far. We commend DCA for quickly onboarding new community-based organizations to the program and conducting extensive outreach to encourage households to apply. We acknowledge the challenges posed by having a short timeline to spend down a large amount of funding via an innovative program design with local community partners.

As the final year of ARPA spending begins and with approximately 26% of the targeted 7,200 LRAP units completed,¹ we are concerned that there may be unspent ARPA funds at the end of 2026. We are further concerned that currently unspent funds will be reallocated for purposes other than lead poisoning prevention, while there are approximately 2,000,000 units across New Jersey that contain potential lead-paint hazards. **We ask that DCA elevate LRAP spenddown and equitable Lead-Based Paint in Rental Housing Inspection Law enforcement as a gubernatorial transition priority, implement the suggested program changes below to support spenddown of LRAP funds to make low- and moderate-income housing across the state lead-safe, and communicate expectations for future budget prioritization of the LRAP program.**

In 2024, Lead-Free NJ made several recommendations [in a letter to the DCA](#) to ease barriers to accessing LRAP funds for New Jersey households most at risk of lead exposure. Ongoing conversations amongst the LFNJ collaborative, including a number of LRAP agencies, about spenddown, capacity concerns, and federal atmosphere consequences on LRAP pipeline rates, make clear that programmatic changes are still needed to facilitate LRAP funds reaching communities for full spenddown. Below is a summary of changes to the LRAP program that LFNJ and partners support to aid in spenddown and reaching households most at risk of lead exposure over the final year of ARPA spending:

- **Increase Per Unit Funding Caps:** Formally increase caps on funding per unit to deliver lead remediation and abatement when all hazard reduction measures are within expected item cost. This would aid LRAP agencies in reducing administrative burdens by reducing waits for overage approval and help spend down ARPA funds in units with a

¹ Per November completion number of 1,891 completed LRAP units.

significant number of lead hazards that pose a public health hazard. DCA should consider incorporating square footage and historic designation as considerations for overage requests.

- **Increase Income Eligibility:** Allow LRAP grantees to enroll households earning up to 100% of the Area Median Income, who often cannot afford lead hazard reduction services without additional financing, especially in cases of lead poisoning where a Notice of Violation has been issued, threatening household tenure in the home.
- **Allow Place-Based Eligibility:** Enable LRAP program grantees to verify household income eligibility for the program if the household is located within Qualified Census Tracts as designated by the U.S. Department of Housing and Urban Development ([guidance available here](#)), instead of gathering personal financial information from residents. Other state and local lead hazard reduction programs funded by ARPA are currently using this approach, including the City of Milwaukee, WI.²
- **Regionalize and Increase the number of LRAP Monitors:** Organize LRAP monitor assignments geographically so that monitors gain expertise in local context and additional resources that LRAP organizations can connect clients to. LFNJ appreciates that DCA has begun structuring monitor positions to support this. Increase LRAP Monitors to at least ten staff, allowing for each to oversee five LRAP agencies. Program monitors play a key role in tracking performance, ensuring quality service delivery, and providing technical assistance and support to program field partners.
- **Allow LI/RAs to serve as Lead Safe Clearance:** Finalize guidance on how local inspectors supporting compliance with the Lead-Based Paint Inspections in Rental Dwelling Units can coordinate with LRAP grantees to complete inspections for lead-safe certificates in tandem with dust lead clearance inspections. A LI/RA clearance report should suffice as a lead-safe clearance report for purposes of the law, and if necessary, the DCA should coordinate with DAG to finalize this change.
- **Support Coordination with Local Agencies:** Take an active role in strengthening referral relationships between local health departments and rental inspection divisions by convening agency leaders.
- **Regular Technical Assistance Call:** Incorporate a regular sounding board meeting for LRAP agencies and key stakeholders to discuss challenges and needs beyond HESWAP/CRM technical support. This can be incorporated into existing technical support meetings by including a knowledgeable program manager or specialist. LFNJ has convened a LRAP peer table meeting over several months and has found it extremely useful for knowledge sharing and discussing challenges. Adding appropriate agency staff to calls like this would be invaluable to facilitate timely responses and discussions as we enter the final year of ARPA spenddown. Additionally, LRAP agencies have expressed that HESWAP/CRM technical support calls could be more valuable if they featured short topic demos during each session to prompt questions.

These suggestions have been developed through conversation with LRAP grantees and through the Lead-Free NJ Housing Committee, a group of over 100 lead remediation professionals and community advocates collaborating to identify policies that support the

²[City of Milwaukee Recovery Plan](#)

elimination of housing-related lead hazards. **We urge NJ DCA to implement as many of these items as possible in January 2026, because at this point, less than one year will remain to spend all ARPA funds allocated for LRAP.**

Lead-Free NJ is eager to see DCA advance LRAP and appreciates DCA's partnership and communication in program implementation. We extend our support from the collaborative to help the state in expeditiously and successfully spending down this historic \$180 million allocation. We appreciate the urgency created by this timeframe and we look forward to supporting DCA and LRAP agencies in assisting New Jersey families.

Sincerely,

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