



June 29, 2026

Honorable Paul D. Moriarty
129 Johnson Road, Suite 1
Turnersville, New Jersey 08012

Honorable Annette Quijano
70 Union Street
Elizabeth, New Jersey 07202

Kevin Jarvis
Acting Commissioner
New Jersey Department of Labor and Workforce Development
PO Box 110
Trenton, NJ 08625-0110

Re: P.L. 2025, c.279: Recommendation to Delay and Revise

Dear Senator Moriarty, Assemblywoman Quijano, and Commissioner Jarvis,

The Employers Association of New Jersey (EANJ) reached out to several hundred employers across the state, spanning a range of industries and business sizes, to assess the impact of P.L. 2025, c.279 and the resulting changes to Temporary Disability Insurance (TDI) and Family Leave Insurance (FLI), which take effect July 17, 2026. Of those, we held in-depth meetings with approximately 100 businesses to understand specific compliance and operational concerns.

Based on that outreach, we respectfully recommend that implementation of P.L. 2025, c.279 be delayed until the significant issues identified can be addressed and the New Jersey Department of Labor (NJDOLE) has developed the technology and operational procedures needed to provide timely employee information to employers. Most critical is the absence of any guidance from NJDOLE to the business community. Nineteen days is not enough time for businesses to receive, interpret, and act on that guidance, let alone make the business model and staffing changes necessary to comply.

Beyond the immediate timeline, the legislation's job restoration provisions lack defined parameters, leaving employers exposed to ambiguity that guidance alone cannot resolve. A delay creates the runway needed for NJDOLE to issue guidance in the near term, but it does not fix this underlying structural gap. We recommend the Legislature pursue a clean-up bill to

establish workable parameters for job restoration, including undue hardship provisions and coordination with existing federal and NJ leave laws, separate from and in addition to any delay in the effective date.

Attached is a summary of the areas of the legislation most in need of clarification or modification, along with employer comments on their core concerns: compliance uncertainty, risk of private action, and the detrimental impact on their operations and the populations they serve.

Carve-outs for small businesses or unique industry entities may have been a path forward; however, after hearing from county governments, municipalities, non-profits, educational institutions, and employers of all sizes, such an approach will not suffice. The repercussions are too widespread and varied, the full extent of which remains unknown.

EANJ recommends that changes to NJ TDI and FLI not be analyzed in isolation. These provisions should be evaluated in conjunction with all associated state and federal leave laws to ensure your goals may be achieved without causing unnecessary conflict, confusion, and economic burden on New Jersey businesses.

We understand the intent of the legislation is to provide job protection while avoiding a 'one-size-fits-all' implementation. To accomplish those goals without undue hardship on employer members and the broader business community, we respectfully request that the legislation be placed on hold.

Helping employers navigate the intersection of federal and state leave laws is what EANJ does every day. Our professional staff regularly works through how TDI, FLI, NJFLA, FMLA, ADA and NJLAD align and where they diverge, and we are well positioned to help as you look at these provisions alongside the broader leave law landscape. We are glad to assist with outreach to the employer community or provide guidance as you evaluate next steps.

Thank you for your consideration.

Sincerely,



Christine Myers
President
Employers Association of New Jersey

Cc: Sen. Joseph Pannacchio
Asm. John DiMaio
Asw. Sweeney