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The Supreme Court "Clarifies" ADA Title I Protections for Retired Workers

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On June 20, 2025, the U.S. Supreme Court issued its long-awaited opinion in *Stanley v. City of Sanford*, No. 23-997, addressing the scope of protections available to retired workers under Title I of the Americans with Disabilities Act, 42 U.S.C. § 12112(a) (ADA), which generally prohibits disability discrimination against employees. In sum, the Court held that the ADA's antidiscrimination protections do *not* extend to retired workers who no longer hold or desire a job at the time of the alleged discrimination.

Specifically, the City of Sanford reduced health insurance benefits for its disabled retirees. At that time, the City employed Karyn Stanley as a firefighter, and Ms. Stanley was not disabled. Two years into her retirement, Ms. Stanley filed an ADA employment-discrimination claim against the City. But Ms. Stanley did not specify when she became disabled, so lower courts and the Supreme Court denied Ms. Stanley's ADA claim, finding that she was not a "qualified individual," under the meaning of the ADA, and thus not entitled to receive ADA protections. Instead, the Supreme Court ruled that a "qualified individual" must be a current or prospective employee only.

While this decision is employer-friendly on its face, the devil is in the details for ADA compliance. In fact, Justice Gorsuch's opinion noted that retired workers who claim to have experienced disability discrimination during their employment may still state a viable claim under the ADA (subject to any statute of limitations). Had Ms. Stanley alleged that discrimination occurred *during her employment*, she likely would have succeeded in proceeding with her ADA claim. In essence, the City of Sanford got a little lucky and avoided ADA liability because Ms. Stanley did not plead discrimination during her employment period.

The majority opinion also acknowledged "a variety of other [state and federal] laws besides Title I of the ADA [that] may protect retirees from discrimination with respect to postemployment benefits." As such, even compliance with *this* ADA opinion may not be enough to avoid liability based on other statutory protections for retired workers. Indeed, Ms. Stanley's case provoked four Supreme Court opinions, with Justice Jackson writing a fiery dissent, suggesting that the law on discrimination cases for postemployment benefits remains unsettled.

Proactive employers should consider seeking legal advice before implementing any new policies (or individualized decisions) regarding

retirement benefits for their disabled employees or former employees.

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