

Supreme Court Denies Retiree's ADA Claim for Postemployment Benefits

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In a June 20, 2025, [opinion](#), the U.S. Supreme Court affirmed the U.S. Court of Appeals for the Eleventh Circuit's decision that a retiree could not successfully assert a discrimination claim under the Americans with Disabilities Act (ADA) due to her former employer's change to its postemployment benefits policy. The decision is most noteworthy, not for its relatively narrow ruling, but more for the future insights it provides to employers. In other words, the Supreme Court's decision does not foreclose the possibility that retirees who compose more precise pleadings, could properly bring discrimination claims under the ADA against their former employers.

Background

Plaintiff Karyn Stanley worked as a firefighter for the city of Sanford, FL, from 1999 to 2018. In 2003, Sanford revised its health insurance policy to provide only 24 months of postemployment benefits for disabled employees who retired with fewer than 25 years of service. Previously, its policy provided health insurance until age 65 for employees who retired early due to a disability. Stanley asserted she became disabled while employed, and contended that she was entitled to the more generous benefits provided in the previous policy. However, Sanford disagreed with Stanley's interpretation, and Stanley filed suit in a Florida federal district court. The district court dismissed the claim, determining that Stanley was not a qualified individual under the ADA because her complaint acknowledged that the discrimination had occurred after she retired. The Eleventh Circuit affirmed that decision. Stanley appealed that decision to the Supreme Court, where, as in the lower courts, Stanley contended that Sanford violated the ADA by awarding her only the lesser benefits of its new policy.

Holding

Writing for the majority, Justice Neil Gorsuch opined that the ADA's definition of "qualified individual" as someone "who, with or without reasonable accommodation, can perform the essential functions of the employment position that [she] holds or desires" did not apply to Stanley because she is a retiree. The majority reached this conclusion primarily because the ADA defined the term "qualified individual" in the present tense, meaning that it applies only to current employees and applicants for employment. Accordingly, the Supreme Court ruled that Stanley was not a qualified individual under the ADA and could not assert a claim for the allegedly discriminatory administration of Sanford's postemployment benefits program.

Potential Claims by Other Retiree Plaintiffs

Despite ruling for Sanford, the *Stanley* decision does not eliminate retirees' rights to assert ADA claims against

their former employers. In that regard, Justice Gorsuch charted several avenues for disabled retirees to successfully pursue ADA claims in the future, notwithstanding his opinion on behalf of the majority. For example, Justice Gorsuch indicated that retirees could potentially still pursue ADA claims by more precisely pleading that they were disabled at the time their employer implemented a discriminatory postemployment benefits policy. Justice Gorsuch also suggested that a retiree who more specifically describes the nature of their disability may be able to successfully still pursue an ADA claim, in contrast to Stanley, who failed to specify her disability, Parkinson's disease, in her complaint. A dissent from Justice Ketanji Brown Jackson and partial dissent from Justice Sonia Sotomayor bolstered these possibilities, as both justices stressed their view that retirees can and do satisfy the ADA's qualified individual definition.

In light of the *Stanley* decision, when making changes to a benefits plan that could affect former employees and retirees, employers should consider the risk of claims left open by Justice Gorsuch's opinion.

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