

TEXAS DEPARTMENT OF LICENSING AND REGULATION



**Ex Officio Addendum Report
to
Governor's Committee on People with Disabilities**

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Elevator touch screen addendum

Elevators are a critical part of modern infrastructure, enabling mobility and independence in multi-story buildings. Traditionally, elevator call buttons and in-cab controls have relied on tactile, physical interfaces—raised buttons, Braille labels, and audible signals—to ensure accessibility for people with visual and hearing impairments. However, the increasing adoption of touchpad and touchscreen-based control systems has introduced new accessibility challenges that risk excluding these users.

Touchpads, by design, lack the tactile feedback that many visually impaired individuals depend on to navigate controls. Without physical buttons or distinguishable textures, users may struggle to locate and select the correct floor or call button. While some systems attempt to compensate with audio cues or visual displays, these solutions can fall short for individuals with combined visual and hearing impairments, who rely heavily on touch and spatial orientation.

Additionally, touchscreen interfaces often require precise gestures or timing, which may not be intuitive or feasible for all users. In busy or noisy environments, audio feedback can be difficult to hear, while visual cues may be inaccessible to those with low or no vision. The absence of standardized accessibility features across different elevator systems further complicates usability, creating inconsistency and confusion.

As touch-based technologies continue to replace traditional controls, it is essential to address these barriers through inclusive design. Ensuring that elevator systems remain accessible to all users is not only a matter of convenience but also a fundamental requirement for safety, independence, and equal access in public and private spaces.

Requirements

Texas Accessibility Standards (TAS)

(TAS 103) Nothing in these requirements prevents the use of designs, products, or technologies as alternatives to those prescribed, provided they result in substantially equivalent or greater accessibility and usability. Texas requires that

these touchpads are equivalent through the variance process. Two potential touch screen locations

Call controls

- Where provided must be raised or flush
- Located within reach range (15" – 48") to the center line of highest operable part
- Minimum button size of $\frac{3}{4}$ "
- Clear floor space (30"x48") adjacent to the control and along an accessible route
- If up and down buttons, up must be above down – except at destination-oriented elevators
- Must have visible signal to reflect when call answered – except for existing elevators or destination-oriented elevators as long as they have visible and audible signals for which elevator has been called
- If keypads are provided, they must be in the standard telephone arrangement

Car controls

- Buttons must be tactile characters with braille immediately to the left
- Symbols for emergency stop, alarm, door open, door close, main entry floor and phone must be provided with tactile symbols
- Buttons with floor designations with visible indicators to reflect call must be provided and when floor has been reached
- Keypads must be identified with visual characters and centered on the keypad button. The number 5 must have a single raised dot.

Access Board

When the ADA Accessibility Guidelines were published in 2004, destination-oriented elevators were not nearly as common as they are now, though they were on the Access Board's radar enough so that very minimal and not really sufficient requirements were included. The expectation then was that destination-oriented elevators would have a tactile keypad instead of the normal call buttons provided for standard elevators. **Providing a touch screen without tactile controls as the only means for calling the elevator is not considered to be compliant,** and it would be difficult to argue that this would meet the requirement for equivalent facilitation since it would be more difficult for a person who is blind to call the elevator with a touch screen as the only means for calling it. Destination-oriented elevators may be addressed if the Board develops accessibility guidelines

for self-service transaction machines. It is likely that some sort of tactilely discernable means of calling the elevator would be required. The touchpads would have to meet with equivalent access to be acceptable.

Texas Elevator Safety

Touch screens are permitted as “Destination Dispatch System” on a pedestal but must be reviewed within the TDLR plan review phase of the elevator. This plan review with the elevator program would not be reviewing for accessibility needs, just mechanical. Some products have audio, but not all, and are typically just on a dedicated car, not the full bank of cars. Some example manufacturers are Kone and Schindler. Manufacturers would need additional guidance in order to make a product that would be accessible for all.

Examples

These examples illustrate current industry approaches to elevator touch interfaces. Their inclusion does not imply compliance with accessibility standards or suitability for all users.

[MAD Touch-to-Go Touchscreens](#)

Alternate keypad below with braille and accessibility function, standard telephone arrangement

[Elevator destination control](#)

Wall-mounted, additional “transit” time available, standard telephone arrangement

[Compass® 360 | Elevator Dispatch Management System | Otis](#)

Wall-mounted, high-contrast screen and verbal instructions, additional “transit” time available

Summary

Touchscreen and touchpad-based elevator controls are becoming more common, but they introduce significant accessibility challenges for individuals with visual and hearing impairments. Unlike traditional tactile buttons with Braille and audible cues, touch interfaces lack physical feedback, making them difficult to use—especially for those who rely on touch or who have combined sensory impairments. Although some systems

include audio or visual indicators, these are not always sufficient or consistently implemented.

Regulatory frameworks like the Texas Accessibility Standards (TAS) and guidance from the Access Board emphasize the need for controls to remain tactile, clearly labeled, and usable within defined reach and spatial requirements. Touchscreens alone generally do not meet these standards unless they provide equivalent or greater accessibility, which is difficult to achieve without tactile features. While touch-based destination dispatch systems are permitted under Texas elevator safety regulations, accessibility is not always fully addressed during approval processes.

Overall, without consistent standards and inclusive design solutions, touchpad elevator systems risk limiting usability and independence for people with disabilities, highlighting the need for improved guidance and accessible alternatives.