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**MEMORANDUM**

**To:** Orange County Value Adjustment Board  
**From:** Aaron B. Thalwitzer, Esq., VAB Counsel  
**Date:** March 11, 2026  
**Re:** Overview of Florida's Property Tax System

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**I. Introduction**

Rule 12D-9.013(1)(i), F.A.C., requires the VAB to discuss Florida's property tax system during its organizational meeting. The discussion must address the respective roles of participants in the system, opportunities for taxpayer participation, and a summary of taxpayer rights. See Rule 12D-9.013(1)(i), F.A.C.

This memorandum provides a general overview of Florida's property tax system consistent with the Florida Department of Revenue ("DOR") VAB training materials. It summarizes the roles of key participants, outlines the annual property tax calendar, and identifies the principal rights available to taxpayers.

**II. Overview of Roles in Florida's Property Tax System**

**a. Property Appraiser**

Each county elects a property appraiser who is responsible for determining the tax base for ad valorem taxation. Art. VIII, § 1(d), Fla. Const.; § 192.001(3), Fla. Stat. The property appraiser's duties include:

- Determining the just value of all real property and tangible personal property as of January 1 of each tax year. §§ 192.042(1), 193.011, Fla. Stat.
- Applying lawful exemptions, classifications, and assessment limitations, including homestead exemptions and assessment caps. §§ 193.155, 196.011, Fla. Stat.
- Determining assessed value and taxable value for each parcel. §§ 193.155, 193.1554, Fla. Stat.
- Preparing and certifying the county tax roll. §§ 193.114, 193.122, Fla. Stat.

The property appraiser does not set millage rates or determine the amount of taxes levied. § 192.001(3), Fla. Stat.

## **b. Florida Department of Revenue**

The DOR exercises general supervision over the assessment and administration of property taxes throughout the state. § 195.002, Fla. Stat. Its responsibilities include:

- Ensuring uniformity and compliance in county tax rolls through review and approval procedures. §§ 193.1142, 195.096, Fla. Stat.
- Conducting ratio studies to evaluate assessment levels and equity. § 195.096, Fla. Stat.
- Adopting administrative rules governing property tax administration and VAB procedures. § 195.027(1), Fla. Stat.
- Administering the Truth in Millage (“TRIM”) notice requirements. §§ 200.065, 200.069, Fla. Stat.
- Providing forms, training materials, and guidance to property appraisers, tax collectors, and VAB participants. § 195.002, Fla. Stat.

## **c. Taxing Authorities**

Local taxing authorities—including counties, municipalities, school boards, and special districts—are responsible for levying property taxes. §§ 200.001, 200.065, Fla. Stat. These authorities:

- Establish annual budgets.
- Propose and adopt millage rates through the TRIM process. § 200.065, Fla. Stat.
- Conduct public hearings regarding proposed budgets and millage rates. § 200.065, Fla. Stat.

Neither the property appraiser nor the VAB determines tax rates.

## **d. Tax Collector**

The county tax collector is responsible for billing and collecting property taxes. §§ 197.102, 197.322, Fla. Stat. The tax collector’s duties include:

- Issuing annual tax bills. § 197.322, Fla. Stat.
- Collecting property taxes and administering statutory discounts. § 197.162, Fla. Stat.
- Declaring taxes delinquent and conducting tax certificate sales. §§ 197.333, 197.432, Fla. Stat.
- Processing certain refunds authorized by statute. §§ 197.182, 197.1825, Fla. Stat.

## **e. Value Adjustment Board**

Each county maintains a VAB to hear administrative challenges to property assessments and certain exemption or classification determinations. § 194.015, Fla. Stat. The VAB consists of five members:

- Two members of the county commission.
- One member of the school board.
- One citizen appointed by the county commission who owns homestead property in the county.
- One citizen appointed by the school board who owns a business occupying commercial space within the school district. § 194.015(1), Fla. Stat.

The VAB is an independent quasi-judicial body that reviews disputes between taxpayers and the property appraiser.

## **III. Annual Property Tax Calendar**

Florida’s property tax system follows a predictable annual cycle established by statute.

**a. January 1 — Assessment Date**

Property is assessed as of January 1 of each year. § 192.042(1), Fla. Stat. The property appraiser determines just value as of this date.

**b. March 1 — Exemption Filing Deadline**

Applications for homestead and most other exemptions must be filed by March 1. § 196.011(1), Fla. Stat.

**c. August — TRIM Notice Issued**

Property owners receive a TRIM notice that shows assessed value, proposed millage rates, and estimated taxes. § 200.069, Fla. Stat.

The notice also identifies the dates and locations of public hearings for taxing authorities.

**d. September — Budget and Millage Hearings**

Taxing authorities conduct public hearings and adopt final millage rates and budgets. § 200.065, Fla. Stat.

**e. November 1 — Tax Bills Issued**

Tax collectors mail annual tax bills on or about November 1. § 197.322(1), Fla. Stat.

Early payment discounts are available:

- 4% in November
- 3% in December
- 2% in January
- 1% in February
- No discount in March. § 197.162, Fla. Stat.

**f. April 1 — Taxes Become Delinquent**

Unpaid taxes become delinquent on April 1. § 197.333, Fla. Stat.

**e. June 1 (or Earlier) — Tax Certificate Sales**

Tax collectors conduct tax certificate sales on or before June 1 for delinquent taxes. § 197.432, Fla. Stat.

**IV. Assessment Appeals and VAB Process**

**a. Petitions to the VAB**

A property owner or authorized agent may file a petition with the VAB to challenge:

- Property valuation. § 194.011(3), Fla. Stat.
- Denial of an exemption. § 194.011(3), Fla. Stat.
- Denial of an agricultural or other statutory classification. § 194.011(3), Fla. Stat.
- Denial of a tax deferral application. § 197.253(2), Fla. Stat.
- Certain determinations relating to ownership or qualifying improvements affecting assessment limitations. § 193.155, Fla. Stat.

Petitions generally must be filed within 25 days after the TRIM notice is mailed. § 194.011(3)(d), Fla. Stat.

#### **b. Special Magistrates**

In counties with populations exceeding 75,000, the VAB appoints special magistrates to conduct evidentiary hearings and make recommendations to the board. § 194.035(1), Fla. Stat.

Special magistrates must possess specified professional qualifications depending on the type of petition. § 194.035(1), Fla. Stat.

#### **c. VAB Final Decisions**

Following the hearings process, the VAB issues written final decisions on petitions. § 194.034(2), Fla. Stat.

### **V. Judicial Review**

A taxpayer who disagrees with a VAB decision may file an action in circuit court seeking review of the assessment or exemption determination. § 194.036, Fla. Stat.

Judicial review is also available without first filing a VAB petition under certain circumstances. § 194.171, Fla. Stat.

### **VI. Florida Taxpayer Rights**

Rule 12D-9.001, F.A.C., identifies the rights of taxpayers participating in the VAB process. These rights include:

- The right to receive notice of property assessments through the TRIM process. §§ 194.011(1), 200.069, Fla. Stat.
- The right to request an informal conference with the property appraiser. § 194.011(2), Fla. Stat.
- The right to file a petition with the VAB challenging an assessment or exemption determination. § 194.011(3), Fla. Stat.
- The right to represent themselves or to be represented by legal counsel or an authorized agent. § 194.034(1)(a), Fla. Stat.
- The right to present evidence and cross-examine witnesses during VAB hearings. Rule 12D-9.008, F.A.C.
- The right to receive written findings and decisions following VAB proceedings. § 194.034(2), Fla. Stat.
- The right to seek judicial review of VAB decisions in circuit court. §§ 194.036, 194.171, Fla. Stat.

Certain taxpayer records submitted during the assessment process may be confidential under Florida law. § 193.074, Fla. Stat.

### **VII. Opportunities for Public Participation**

Taxpayers may participate in Florida's property tax system in several ways:

- Attending public hearings where taxing authorities adopt millage rates and budgets. § 200.065, Fla. Stat.
- Participating in VAB hearings and meetings, which are open to the public. § 286.011, Fla. Stat.
- Requesting informal conferences with the property appraiser to resolve valuation disputes without formal proceedings. § 194.011(2), Fla. Stat.
- Participating in rulemaking proceedings administered by the DOR. § 120.54, Fla. Stat.

### **VIII. Conclusion**

Florida's property tax system divides responsibilities among property appraisers, taxing authorities, tax collectors, the DOR, and the VAB. Each entity performs a distinct role designed to ensure that property assessments are lawful,

taxes are levied through transparent public processes, and taxpayers have meaningful opportunities to challenge assessments and participate in the system.

This memorandum is intended to assist VAB members in understanding the structure and operation of Florida's property tax system as part of the VAB's organizational meeting requirements under Rule 12D-9.013(1)(i), F.A.C.