

The Georgetown School

Executive Director / CEO

EIN 462979006

SC · NTEE B99

FY ending 2025-06-30

June 9, 2026

This analysis benchmarks the total compensation of **Gary Gates, Executive Director / CEO** (\$39,000) against **every comparable organization** that fit the selection criteria — **432** in total — drawn systematically from IRS Form 990 filings, not a hand-picked subset.

Compensation sits at approximately the **33rd** percentile of comparable organizations within the typical range

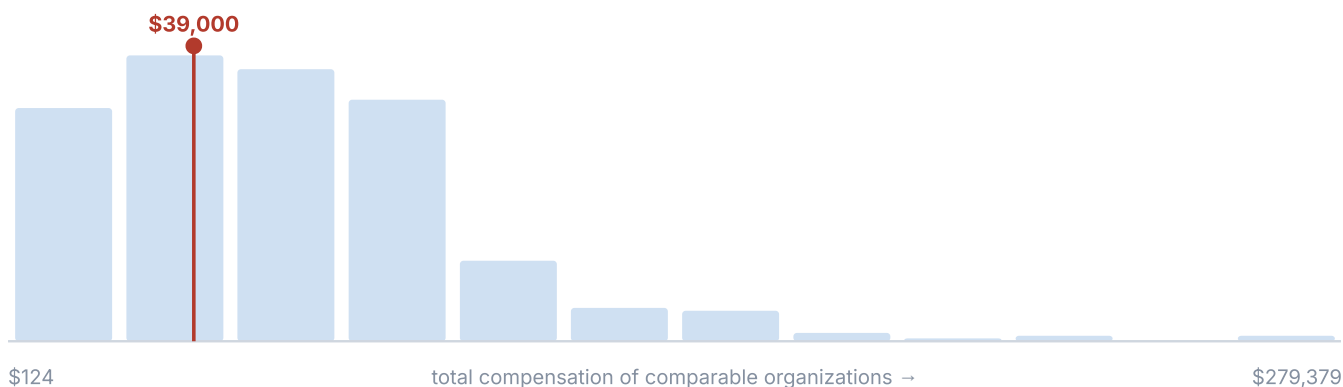
Benchmarked executive: Gary Gates — reported title “Head of School”, a **direct title match** to the Executive Director / CEO role.

How comparable organizations were selected

SECTOR	Organizations sharing the subject's NTEE classification (B99).
BUDGET	Total revenue between \$207,393 and \$464,314 — 0.67x to 1.50x the subject's \$309,543 (the band tightens as size grows).
GEOGRAPHY	Same NTEE sector (B99), nationwide + budget 0.67–1.5x revenue.

432 organizations qualified on sector, size, and geography → **432** within the band form the benchmarked peer set.

Distribution of comparable compensation



\$13,549	\$30,906	\$52,703	\$76,385	\$103,727	\$39,000
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● Comparable organizations

Each figure is Form 990 Part VII columns D + F (reportable pay plus other compensation and benefits; column F may include amounts from related organizations), normalized to SC cost of living (BEA RPP, 2023) and to its filing year (CPI-U); the reported amount is on each linked 990.

ORGANIZATION	STATE	REVENUE	MATCHED TITLE	COMP (REPORTED)	COMP (ADJUSTED)	FY
Memphis-area Home Education Association Inc	TN	\$309,622	Office Manager	\$9,472	\$9,797	2024
New Life With Education	KS	\$308,343	Member At Large	\$39,600	\$43,336	2023
Craftsmen Recreation Club Inc	OH	\$308,238	Manager	\$55,680	\$59,738	2023
Collierville Education Foundation	TN	\$308,176	Managing Director	\$21,500	\$22,236	2024
National Railroad Hall Of Fame Inc	IL	\$311,239	Executive Director	\$40,000	\$38,692	2024
Central Ms Down Syndrome Society Inc	MS	\$307,826	Executive Dir.	\$50,000	\$56,410	2023
Simplify Global Education Inc	VA	\$311,376	President	\$68,600	\$65,171	2024
Association Of Independent Schools	FL	\$307,514	Executive Director	\$52,091	\$48,148	2024
Northern Berkshire Community	MA	\$311,635	Executive Di	\$88,217	\$77,998	2024
Foundation For Mechanical Insulation	VA	\$313,025	Program Manager/lead	\$44,179	\$41,971	2024
College For Kids	MO	\$305,159	Director	\$22,000	\$22,926	2024
Community Enhancement Foundation Of Plains	KS	\$304,277	Member	\$6,507	\$7,120	2023
Alaska Farmers Market Association	AK	\$314,909	Co-director	\$43,307	\$40,738	2024

ORGANIZATION	STATE	REVENUE	MATCHED TITLE	COMP (REPORTED)	COMP (ADJUSTED)	FY
Sandy Springs Education Force Inc	GA	\$315,023	Executive Dir.	\$46,020	\$45,528	2024
Chamber Of Commerce - Greater Beloit	WI	\$315,450	Executive Director	\$80,474	\$82,692	2024
West Virginians For Affordable	WV	\$303,490	Executive Director	\$103,300	\$110,048	2024
Being Built Together	CA	\$302,850	President	\$65,695	\$55,815	2024
Cincinnati Interfaith Workers Cente	OH	\$302,833	Executive Di	\$75,561	\$78,743	2024
Pegasus Media Project	TX	\$301,363	Co-founder Exec Dir	\$55,978	\$53,674	2025
Two Bikes Chattanooga	TN	\$317,905	Ceo	\$38,817	\$40,146	2024
Eastern Educational Resource	OR	\$301,148	President	\$52,500	\$49,387	2023
C2e Incorporated	GA	\$300,619	Finance Dir	\$6,572	\$6,502	2024
262 Foundation Inc	MA	\$300,469	President	\$42,000	\$37,134	2024
Marshallese American Network For Interacting Together	OR	\$300,457	Executive Director/secretary	\$67,800	\$61,950	2024
Project Diva	MN	\$300,416	Executive Director	\$80,495	\$76,241	2025

Comp (reported) is the figure on each organization's Form 990 (columns D + F); **Comp (adjusted)** normalizes it to SC cost of living and 2025 dollars. Click any organization to verify the figure on ProPublica.

■ Methodology

Comparable organizations were drawn from electronically filed IRS Form 990 returns and matched on sector (NTEE code), budget (a size-adaptive revenue band that tightens as the organization grows), and geography (same-state first, broadening only when too few peers qualify); every organization within the band forms the peer set. To compare fairly across regions and years, peer compensation is normalized to SC cost of living (BEA Regional Price Parities, 2023) and to the subject's filing year (CPI-U). The figure benchmarked is Form 990 Part VII, Section A, columns D + F — reportable pay plus other compensation, benefits, and deferred amounts (column F may include amounts from related organizations) — with the chief executive matched by role. Related-organization amounts (column E) and institutional trustees are excluded. Full methodology: peerbasis.org/methodology.

■ Sample, role match & sensitivity

PEER COUNT	432 organizations. Compensation range \$124–\$279,379; filing years 2021–2025.
SIZE BASIS	Matched on total revenue (\$309,543); for reference, expenses \$322,017 and assets \$1,250.
ROLE MATCH	Gary Gates, reported title " <i>Head of School</i> ", benchmarked as Executive Director / CEO. The title maps directly to this role.
RELATED-ORG PAY	29 peers report related-organization compensation (column E), which the D + F benchmark does not fully capture; review where material.
OUTLIERS	18 peers fall outside 1.5× the interquartile range — consider whether any reflect one-time payments (severance, deferred-comp payouts).

Sensitivity — the subject's percentile under alternative compensation definitions:

BASIS	SUBJECT PERCENTILE
Total compensation (D + F), cost-of-living + inflation adjusted — the PeerBasis default	33 rd
Total compensation (D + F), as reported (no adjustments)	32 nd
Reportable pay only (column D), adjusted	35 th
All sources (D + E + F), adjusted	29 th

If the percentile moves materially across these definitions, the result is sensitive to methodology choices, and the board should weigh which basis best fits its facts.

● Rebuttable presumption of reasonableness · 26 CFR 53.4958-6

Compensation paid by a tax-exempt organization is presumed reasonable — shifting the burden to the IRS — when three requirements are met. This report supplies the comparability data for the second. The board should record the following in its minutes *concurrently* with its decision:

Draft board minutes – executive compensation

1. The compensation of the Executive Director / CEO (Gary Gates) was approved in advance by [the Board / Compensation Committee], composed of members with no conflict of interest with respect to the arrangement.
2. Prior to its determination, the authorized body obtained and relied upon appropriate comparability data, namely the PeerBasis Compensation Comparability Determination dated June 9, 2026, comparing compensation against 432 similarly situated organizations (Same NTEE sector (B99), nationwide + budget 0.67–1.5× revenue).
3. The authorized body determined that total compensation of \$39,000 is reasonable (approximately the 33rd percentile of comparable organizations) and documented the basis for this determination concurrently, on [date], by a vote of [__ for / __ against].

Sources: IRS Form 990 e-file data (apps.irs.gov); IRS Business Master File (NTEE classification). Every figure traces to an original public filing — click any organization above to verify it on ProPublica. PeerBasis is a service of Prismind Analytics; its [methodology is published](#), was commissioned for independent adversarial review, and discloses its own limitations. This report is comparability data to support a board's good-faith determination under IRC 4958; it is not legal or tax advice. Generated by PeerBasis on June 9, 2026.