

American Subcontractors Association Of O

Executive Director / CEO

June 9, 2026

This analysis benchmarks the total compensation of **Libby Hardy, Executive Director / CEO** (\$64,174) against **every comparable organization** that fit the selection criteria — **387** in total — drawn systematically from IRS Form 990 filings, not a hand-picked subset.

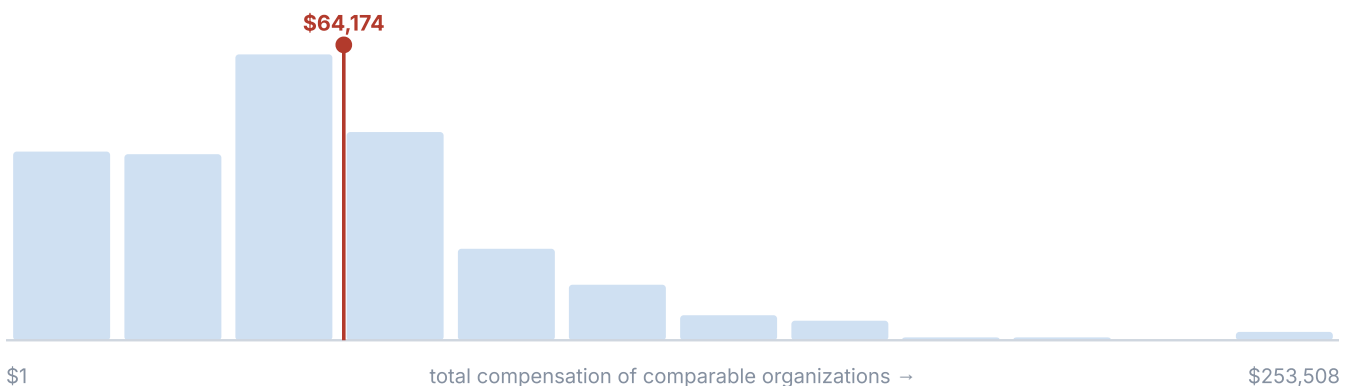
Compensation sits at approximately the **63rd** percentile of comparable organizations within the typical range

How comparable organizations were selected

SECTOR	Organizations sharing the subject's NTEE classification (S41).
BUDGET	Total revenue between \$132,359 and \$296,326 — 0.67x to 1.50x the subject's \$197,551 (the band tightens as size grows).
GEOGRAPHY	Same NTEE sector (S41), nationwide + budget 0.67–1.5x revenue.

387 organizations qualified on sector, size, and geography → **387** within the band form the benchmarked peer set.

Distribution of comparable compensation



\$9,865 10TH	\$31,490 25TH	\$54,297 MEDIAN	\$75,295 75TH	\$106,839 90TH	\$64,174 THIS ORG · 63RD
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■ **Comparable organizations**

P50
P75
P90

\$9,865
\$31,490
\$54,297
\$75,295
\$106,839

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 OK cost of living (BEA RPP, 2023) and to its filing year (CPI-U); the reported amount is on each linked 990.

ORGANIZATION	STATE	TOTAL REVENUE	TOTAL COMP	SOURCE
Swedish Medical Center Medical	CO	\$198,392	\$14,802	990
Trussville Chamber Of Commerce	AL	\$196,388	\$45,905	990
The Village At Sherman Oaks Inc	CA	\$198,810	\$9,410	990
The Greater Okc Asian Chamber Of Commerce	OK	\$196,154	\$24,534	990
Excelsior Springs Area Chamber	MO	\$196,002	\$44,402	990
Pennsylvania State Assn Of County	PA	\$199,332	\$17,703	990
Central New York Defense Alliance Ltd	NY	\$199,533	\$9,027	990
Tennessee Infrastructure Alliance	TN	\$200,000	\$83,449	990
Digital Energy Council	DC	\$200,000	\$19,923	990
Pomerado Hospital Medical Staff	CA	\$194,837	\$48,620	990
Fort Davis Chamber Of Commerce	TX	\$194,789	\$12,509	990
Sheboygan Falls Chamber Main Street	WI	\$194,417	\$49,344	990
Association Of Health Care	MO	\$200,730	\$5,210	990
Chemical Alliance Zone Inc	WV	\$200,945	\$170,244	990
Wisconsin Badger Chapter Club Management	WI	\$201,353	\$54,297	990
American Knife And Tool Institute Inc	WY	\$193,706	\$52,707	990
Massachusetts Association Of	MA	\$201,599	\$108,992	990
North Coast Fishermens Cable Committee	CA	\$201,795	\$3,290	990
Independent Electrical Contractors	CO	\$201,942	\$104,883	990
Association Of Extremity Nerve Surgeons	TX	\$202,068	\$48,803	990
Virginia Association Of Independent	VA	\$202,244	\$92,780	990
Red Oak Chamber And Industry Association Inc	IA	\$192,644	\$50,216	990
Green Motors Practices Group	ID	\$191,962	\$60,056	990
Certified Pest Control Operators Of Geor	GA	\$203,348	\$32,859	990

ORGANIZATION	STATE	TOTAL REVENUE	TOTAL COMP	SOURCE
Great Lakes Bay Regional Alliance	MI	\$191,747	\$87,132	990

■ 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 OK 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	387 organizations. Compensation range \$1–\$253,508; filing years 2021–2025.
SIZE BASIS	Matched on total revenue (\$197,551); for reference, expenses \$213,486 and assets \$223,417.
ROLE MATCH	Libby Hardy, reported title " <i>EXECUTIVE DIRECTOR</i> ", benchmarked as Executive Director / CEO. The title maps directly to this role.
RELATED-ORG PAY	19 peers report related-organization compensation (column E), which the D + F benchmark does not fully capture; review where material.
OUTLIERS	12 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	63 rd
Total compensation (D + F), as reported (no adjustments)	53 rd
Reportable pay only (column D), adjusted	64 th
All sources (D + E + F), adjusted	59 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 (Libby Hardy) 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 387 similarly situated organizations (Same NTEE sector (S41), nationwide + budget 0.67–1.5× revenue).
3. The authorized body determined that total compensation of \$64,174 is reasonable (approximately the 63rd 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). 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.