

# Bay Aging Apartments Middlesex Inc

Executive Director / CEO

EIN 731676722

VA · NTEE L22

FY ending 2025-03-31

June 9, 2026

This analysis benchmarks the total compensation of **Kathy E Vesley, Executive Director / CEO** (\$267,673) against **every comparable organization** that fit the selection criteria — **263** in total — drawn systematically from IRS Form 990 filings, not a hand-picked subset.

Compensation sits at approximately the **99<sup>th</sup>** percentile of comparable organizations above the 90th percentile — board review recommended

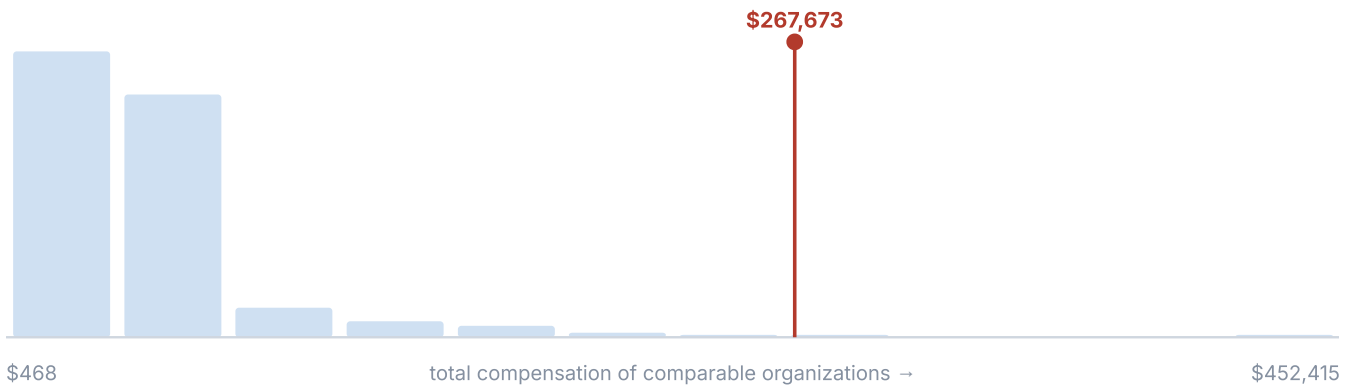
**Benchmarked executive:** Kathy E Vesley — reported title “PRESIDENT”, a **direct title match** to the Executive Director / CEO role.

## How comparable organizations were selected

SECTOR	Organizations sharing the subject's NTEE classification (L22).
BUDGET	Total revenue between \$231,273 and \$517,776 — 0.67x to 1.50x the subject's \$345,184 (the band tightens as size grows).
GEOGRAPHY	Same NTEE sector (L22), nationwide + budget 0.67–1.5x revenue.

**263** organizations qualified on sector, size, and geography → **263** within the band form the benchmarked peer set.

## Distribution of comparable compensation



\$10,535	\$22,040	\$39,866	\$62,540	\$85,372	<b>\$267,673</b>
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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 VA 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
<a href="#">Ucc Iii Inc</a>	OH	\$345,339	Treasurer	\$34,230	<b>\$39,680</b>	2023
<a href="#">Elmore Area Concerned Christians Inc</a>	OH	\$346,983	Chief Executive Director	\$92,614	<b>\$104,280</b>	2024
<a href="#">Ridge Oak Management Inc</a>	NJ	\$342,077	Executive Director	\$255,355	<b>\$236,127</b>	2025
<a href="#">Mcauley Manor Inc</a>	CO	\$348,558	Director	\$37,575	<b>\$38,303</b>	2024
<a href="#">Charles Street Village Inc</a>	CA	\$348,676	Ceo	\$34,300	<b>\$32,416</b>	2023
<a href="#">El Mirage Senior Village</a>	CO	\$348,997	Vice President	\$34,402	<b>\$36,104</b>	2023
<a href="#">The Wartburg Residential Community Inc</a>	NY	\$349,539	President	\$90,025	<b>\$86,481</b>	2024
<a href="#">Brook Oaks Senior Residences Inc</a>	OH	\$350,229	President	\$48,755	<b>\$54,897</b>	2024
<a href="#">Lutheran Social Services Of Central Ohio</a>	OH	\$340,026	President & Ceo	\$9,088	<b>\$10,535</b>	2023
<a href="#">Buffalo Mercy Housing Development Fund</a>	NY	\$339,655	Board Member/board President	\$25,080	<b>\$24,804</b>	2023
<a href="#">John Marvin Tower</a>	FL	\$350,924	Vice Preside	\$72,591	<b>\$72,496</b>	2024
<a href="#">Afton Manor Inc</a>	IA	\$339,377	Manager	\$13,360	<b>\$16,011</b>	2023
<a href="#">Miracle Mile Senior Citizen Housing Corp</a>	CA	\$351,502	President	\$7,646	<b>\$6,838</b>	2025

ORGANIZATION	STATE	REVENUE	MATCHED TITLE	COMP (REPORTED)	COMP (ADJUSTED)	FY
<a href="#">Capitol Lakes Foundation Inc</a>	WI	\$351,636	Administrative Director	\$50,245	<b>\$55,784</b>	2024
<a href="#">Wisconsin Care Systems Inc</a>	WI	\$353,395	President	\$89,000	<b>\$101,731</b>	2023
<a href="#">Peninsula Housing Development Inc XVIII</a>	FL	\$336,692	Director	\$25,136	<b>\$25,103</b>	2024
<a href="#">Gault Street Senior Housing</a>	CO	\$353,940	President	\$25,195	<b>\$26,442</b>	2023
<a href="#">Manitowoc Rhf Housing Inc</a>	CA	\$354,889	President/ceo	\$68,128	<b>\$62,540</b>	2024
<a href="#">Community For Affordable Senior</a>	MN	\$335,417	Evp Of Commonbond Housing	\$18,918	<b>\$20,459</b>	2023
<a href="#">Rosewood Court Inc</a>	MN	\$355,963	Ceo Of Bhs	\$158,313	<b>\$171,213</b>	2023
<a href="#">Lutheran Housing Services 18 Inc</a>	OH	\$332,392	President/ce	\$62,368	<b>\$72,299</b>	2023
<a href="#">Ridge Oak Iii Inc</a>	NJ	\$331,830	Executive Director	\$61,663	<b>\$57,020</b>	2025
<a href="#">Snhs Elderly Housing Inc</a>	NH	\$331,493	Treasurer	\$53,564	<b>\$51,224</b>	2025
<a href="#">Plymouth Place Inc</a>	CA	\$329,741	President/ceo	\$68,128	<b>\$62,540</b>	2024
<a href="#">Shepherd Oaks West Apartments Inc</a>	MN	\$361,165	President/ceo/administrato	\$26,425	<b>\$27,758</b>	2024

**Comp (reported)** is the figure on each organization's Form 990 (columns D + F); **Comp (adjusted)** normalizes it to VA 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 VA 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](https://peerbasis.org/methodology).

## ■ Sample, role match & sensitivity

PEER COUNT	263 organizations. Compensation range \$468–\$452,415; filing years 2023–2025.
SIZE BASIS	Matched on total revenue (\$345,184); for reference, expenses \$391,326 and assets \$2,358,706.
ROLE MATCH	Kathy E Vesley, reported title "PRESIDENT", benchmarked as Executive Director / CEO. The title maps directly to this role.
RELATED-ORG PAY	209 peers report related-organization compensation (column E), which the D + F benchmark does not fully capture; review where material.
OUTLIERS	15 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	99 <sup>th</sup>
Total compensation (D + F), as reported (no adjustments)	99 <sup>th</sup>
Reportable pay only (column D), adjusted	100 <sup>th</sup>
All sources (D + E + F), adjusted	52 <sup>nd</sup>

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 (Kathy E Vesley) 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 263 similarly situated organizations (Same NTEE sector (L22), nationwide + budget 0.67–1.5× revenue).
3. The authorized body determined that total compensation of \$267,673 is reasonable (approximately the 99<sup>th</sup> percentile of comparable organizations) and documented the basis for this determination

concurrently, on [date], by a vote of [\_\_ for / \_\_ against].

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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.