

# Paula Apartments Inc

Executive Director / CEO

EIN 770509841  
 CA · NTEE L20  
 FY ending 2024-12-31  
**June 9, 2026**

This analysis benchmarks the total compensation of **Michael P Santero, Executive Director / CEO** (\$53,033) against **every comparable organization** that fit the selection criteria — **38** in total — drawn systematically from IRS Form 990 filings, not a hand-picked subset.

Compensation sits at approximately the **53<sup>rd</sup>** percentile of comparable organizations within the typical range

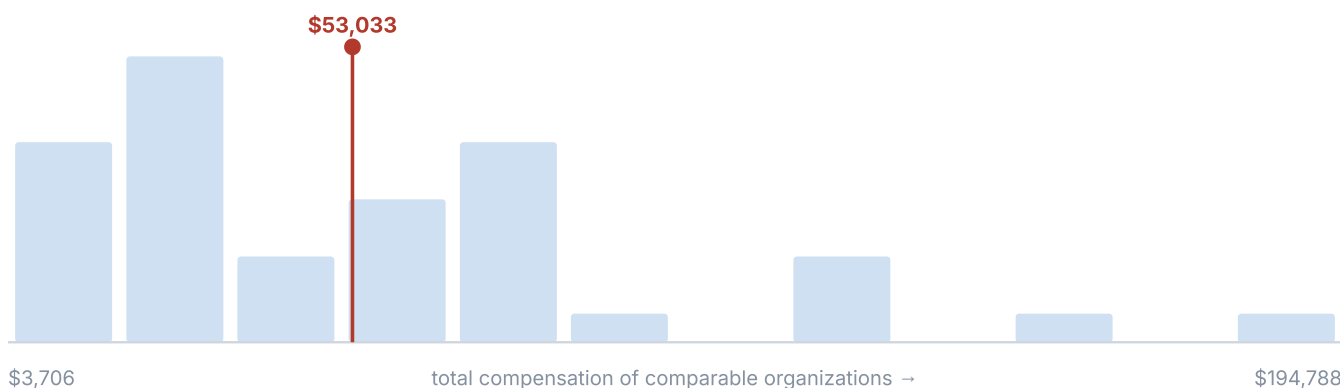
**Benchmarked executive:** Michael P Santero — reported title “NON-VOTING VP/COO”, selected as the organization's **highest-paid individual** — no exact title match, so confirm this is a comparable role.

## How comparable organizations were selected

- SECTOR** Organizations sharing the subject's NTEE classification (L20).
- BUDGET** Total revenue between \$313,418 and \$701,683 — 0.67x to 1.50x the subject's \$467,789 (the band tightens as size grows).
- GEOGRAPHY** Same NTEE sector (L20) + CA + budget 0.67–1.5x revenue.

**38** organizations qualified on sector, size, and geography → **38** within the band form the benchmarked peer set.

## Distribution of comparable compensation



\$12,809	\$24,255	\$49,455	\$68,128	\$117,283	\$53,033
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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 CA 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="#">Nehemiah Project La Inc</a>	CA	\$449,577	President And Ceo	\$48,830	<b>\$50,272</b>	2023
<a href="#">Opportunity Builders A Not For Profit Development</a>	CA	\$446,905	President And Executive Direc	\$31,792	<b>\$32,731</b>	2023
<a href="#">Humboldt Bay Housing Development Corp</a>	CA	\$491,172	Cfo	\$32,291	<b>\$32,291</b>	2024
<a href="#">Bexar Rhf Housing Inc</a>	CA	\$438,912	President/ceo	\$68,128	<b>\$68,128</b>	2024
<a href="#">Pauahi Elderly Inc</a>	CA	\$438,001	President/ceo	\$68,128	<b>\$68,128</b>	2024
<a href="#">Community Economic Development Corporation</a>	CA	\$500,645	President	\$60,000	<b>\$60,000</b>	2024
<a href="#">Hdp Mason Housing Corporation</a>	CA	\$430,446	President & Ceo	\$9,264	<b>\$9,264</b>	2024
<a href="#">Restore Neighborhoods La Inc</a>	CA	\$424,610	Executive Director	\$189,200	<b>\$194,788</b>	2023
<a href="#">California Community Builders Inc</a>	CA	\$417,818	Ceo	\$116,007	<b>\$116,007</b>	2024
<a href="#">Village Gardens Rhf Housing Inc</a>	CA	\$408,945	President/ceo	\$68,128	<b>\$68,128</b>	2024
<a href="#">Southern California Housing Development</a>	CA	\$529,118	President	\$13,750	<b>\$13,750</b>	2024
<a href="#">Friendship House American Indian Healing</a>	CA	\$544,478	Cfo	\$22,554	<b>\$23,220</b>	2023
<a href="#">Vermont Village Community Development Corp Inc</a>	CA	\$383,744	Executive Director	\$84,725	<b>\$87,228</b>	2023
<a href="#">Northpoint Housing Inc</a>	CA	\$553,046	Vice President & Cfo/director	\$120,312	<b>\$123,866</b>	2023

ORGANIZATION	STATE	REVENUE	MATCHED TITLE	COMP (REPORTED)	COMP (ADJUSTED)	FY
<a href="#">St Peters Supportive Housing Inc</a>	CA	\$382,447	Executive Dir.	\$13,111	<b>\$13,498</b>	2023
<a href="#">Santa Barbara Housing Assistance Co</a>	CA	\$381,772	Director/pre	\$22,000	<b>\$22,000</b>	2024
<a href="#">Restoration Community Development Corporation</a>	CA	\$379,048	Executive Director	\$20,689	<b>\$21,300</b>	2023
<a href="#">Nairobi Housing Inc</a>	CA	\$376,230	Evp/cfo	\$120,262	<b>\$120,262</b>	2024
<a href="#">The Salvation Army Puyallup Residences Inc</a>	CA	\$376,169	President	\$32,694	<b>\$33,660</b>	2023
<a href="#">Ivy Hill Development Corporation</a>	CA	\$351,998	Chief Executive Officer	\$16,785	<b>\$16,785</b>	2024
<a href="#">Westerner Mutual Housing Association</a>	CA	\$351,828	Ceo - Thru 9/24	\$27,359	<b>\$27,359</b>	2024
<a href="#">Mid-peninsula Scotts Valley Inc</a>	CA	\$340,716	Cfo / Assistant Secretary	\$77,467	<b>\$77,467</b>	2024
<a href="#">National Housing Corporation</a>	CA	\$337,202	Executive Di	\$157,144	<b>\$161,786</b>	2023
<a href="#">Mid-peninsula Coastside Inc</a>	CA	\$327,693	Cfo / Assistant Secretary	\$59,660	<b>\$61,422</b>	2023
<a href="#">Troy Apartments Inc</a>	CA	\$608,194	Non-voting Vp/coo	\$53,033	<b>\$53,033</b>	2024

**Comp (reported)** is the figure on each organization's Form 990 (columns D + F); **Comp (adjusted)** normalizes it to CA cost of living and 2024 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 CA 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 38 organizations. Compensation range \$3,706–\$194,788; filing years 2023–2025.

SIZE BASIS	Matched on total revenue (\$467,789); for reference, expenses \$498,292 and assets \$2,259,474.
ROLE MATCH	Michael P Santero, reported title " <i>NON-VOTING VP/COO</i> ", benchmarked as Executive Director / CEO. <b>Selected as the organization's highest-paid individual without an exact title match — the board should confirm this is a comparable role.</b>
RELATED-ORG PAY	25 peers report related-organization compensation (column E), which the D + F benchmark does not fully capture; review where material.
OUTLIERS	2 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	53 <sup>rd</sup>
Total compensation (D + F), as reported (no adjustments)	55 <sup>th</sup>
Reportable pay only (column D), adjusted	0 <sup>th</sup>
All sources (D + E + F), adjusted	63 <sup>rd</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 (Michael P Santero) 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 38 similarly situated organizations (Same NTEE sector (L20) + CA + budget 0.67–1.5× revenue).
3. The authorized body determined that total compensation of \$53,033 is reasonable (approximately the 53<sup>rd</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.