

This analysis benchmarks the total compensation of **Paul Willis, Executive Director / CEO** (\$93,340) against **every comparable organization** that fit the selection criteria — **496** in total — drawn systematically from IRS Form 990 filings, not a hand-picked subset.

Compensation sits at approximately the **94th** percentile of comparable organizations above the 90th percentile — board review recommended

Benchmarked executive: Paul Willis — reported title “Vice President”, 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 (L81).

BUDGET Total revenue between \$56,333 and \$126,120 — 0.67x to 1.50x the subject's \$84,080 (the band tightens as size grows).

GEOGRAPHY Same NTEE major group (L), nationwide + budget 0.67–1.5x revenue.

496 organizations qualified on sector, size, and geography → **496** within the band from the benchmarked peer set.

Distribution of comparable compensation



\$6,018	\$12,381	\$25,683	\$43,917	\$73,121	\$93,340
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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 WA 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
Maxcen Housing Society Dc Branch	DC	\$84,045	Ceo	\$5,188	\$5,085	2024
Mercy Outreach Ministries V Inc	OH	\$84,030	Executive Director	\$15,476	\$18,308	2024
Creative Housing Inc V	OH	\$83,987	President	\$9,011	\$10,660	2024
Creative Housing Inc Vi	OH	\$84,329	President	\$8,713	\$10,612	2023
Neighborhood Housing Services Of	MN	\$83,794	Executive Director	\$9,333	\$10,605	2023
Northport Movin' Out Inc	WI	\$84,384	Ceo	\$18,932	\$22,084	2024
Homes For Independence Space Coast Inc	FL	\$84,397	President/ceo	\$38,173	\$41,238	2023
Housing Works Pitkin Avenue Hdgc Inc	NY	\$83,738	Secretary	\$27,348	\$28,418	2023
Mosaic Housing Corp Xiv - Rockford	NE	\$84,510	President	\$26,896	\$32,311	2024
Jones Manor On The Sound	NY	\$83,605	Executive Director	\$12,000	\$12,469	2023
Asi Missoula Inc	MN	\$83,499	President/tr	\$65,715	\$74,669	2023
Abilities At San Juan Ii Inc	FL	\$83,482	President/ceo	\$38,173	\$41,238	2023
Vesta Germantown Inc	MD	\$83,426	President	\$21,417	\$22,364	2024
Patriot Community Development Inc	TX	\$84,746	Treasurer	\$173,421	\$199,483	2023
Lf Bella Vista Apartments Inc	AZ	\$84,942	President/ceo	\$34,911	\$37,501	2024
Shdc No 10 Inc	HI	\$84,951	Exec. Dir. & Asst Secr.	\$12,721	\$13,097	2023

ORGANIZATION	STATE	REVENUE	MATCHED TITLE	COMP (REPORTED)	COMP (ADJUSTED)	FY
Community Alliance Housing	NE	\$83,203	President & Ceo	\$35,341	\$43,710	2023
Greater Springfield Residences Inc	MA	\$83,170	Clerk, Director	\$161,815	\$162,413	2024
202 West 108 Street Hdfc Inc	NY	\$85,011	President	\$25,733	\$25,972	2024
Eden Valley Firemans Relief Association	MN	\$83,119	President	\$350	\$397	2023
Robin's Terrace Inc	OH	\$85,117	President	\$9,146	\$10,820	2024
Walnut Housing Development Corporation	PA	\$85,213	Director Of Construction	\$13,787	\$15,810	2023
Friendship Homes Inc	TN	\$82,927	President	\$36,000	\$41,176	2025
Lakeside Place Inc	FL	\$85,390	President/ceo	\$37,346	\$40,344	2023
Grf 9812 Lockport Road Inc	NY	\$85,457	Chief Financial Officer	\$6,321	\$6,380	2024

Comp (reported) is the figure on each organization's Form 990 (columns D + F); **Comp (adjusted)** normalizes it to WA 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 WA 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 **496** organizations. Compensation range \$91–\$328,989; filing years 2021–2025.

SIZE BASIS Matched on total revenue (\$84,080); for reference, expenses \$120,608 and assets \$150,413. **Revenue and expenses diverge this year — revenue may misrepresent operating size; weigh the expense-based view.**

ROLE MATCH Paul Willis, reported title "*Vice President*", benchmarked as Executive Director / CEO. **Selected as the organization's highest-paid individual without an exact title match — the board should confirm this is a comparable role.**

RELATED-ORG PAY	393 peers report related-organization compensation (column E), which the D + F benchmark does not fully capture; review where material.
OUTLIERS	30 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	94 th
Total compensation (D + F), as reported (no adjustments)	96 th
Reportable pay only (column D), adjusted	0 th
All sources (D + E + F), adjusted	22 nd

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 (Paul Willis) 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 496 similarly situated organizations (Same NTEE major group (L), nationwide + budget 0.67–1.5× revenue).
3. The authorized body determined that total compensation of \$93,340 is reasonable (approximately the 94th 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.