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April 15, 2008

District of Columbia Zoning Commission
Office of Zoning
441 4th Street, NW
Suite 210
Washington, DC 20001

VIA FEDERAL EXPRESS

Re: Foggy Bottom Campus Plan Interim Compliance Report

Office of Zoning:

Enclosed please find a copy of the University's Foggy Bottom Campus Plan Interim Compliance Report, as required under the 2007 Foggy Bottom Campus Plan (ZC Order No. 06-11/06-12).

This report will also be made publicly available to other interested parties on the University's neighborhood website at www.neighborhood.gwu.edu.

If you have questions regarding the attached, please feel free to contact me at 202.994.6600 or at oneila@gwu.edu.

Sincerely,

ALICIA M. O'NEIL
Managing Director, Office of Real Estate

OFFICE OF THE
EXECUTIVE
VICE PRESIDENT

2121 I STREET, NW
WASHINGTON, DC 20052
202-994-6600
FAX 202-994-9304

ZONING COMMISSION
District of Columbia

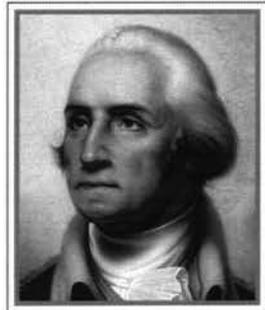
CASE NO. 06/11/06-12
EXHIBIT NO. 260

ZONING COMMISSION
District of Columbia
CASE NO.06-11
EXHIBIT NO.260

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D.C. OFFICE OF ZONING

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**Foggy Bottom Campus Plan Interim Compliance Report
Foggy Bottom Campus Plan (2007)
Zoning Commission Case Nos. 06-11 and 06-12
(as outlined in Condition C-16)**

The George Washington University

April 15, 2008

**Foggy Bottom Campus Plan Interim Compliance Report
Foggy Bottom Campus Plan (2007)
(as outlined in Condition C-16)
April 15, 2008**

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Condition C-4: Foggy Bottom Campus Student Population

Condition:

For the duration of this Plan, Foggy Bottom student headcount shall not exceed 20,000 students, and Foggy Bottom student full-time equivalent shall not exceed 16,553.

- a. *For the purposes of these Conditions,*
 - i. **“Foggy Bottom student headcount”** shall be defined as the number of GW students in the “Foggy Bottom/Mount Vernon Campus Total Student Body”, minus: study abroad students, continuous enrollment students, students that reside at the Mount Vernon Campus, students that take all of their courses at the Mount Vernon Campus, and Foggy Bottom faculty and staff accounted for pursuant to Condition C-5 herein who are also enrolled in one or more courses at the Foggy Bottom campus.
 - ii. **“Foggy Bottom student full-time equivalent”** shall be determined by assigning a fraction to part-time students included in the Foggy Bottom student headcount number based on the number of credits they are taking compared to a full-time course load and adding the number of full-time students. Currently, the full-time course load for undergraduates is 12 credits, and the full-time course load for graduate and professional students is 9 credits. Formulas for determining full-time equivalents may change over the term of the proposed Foggy Bottom Campus Plan depending on program requirements or the restructuring of the academic calendar.
- b. *An audit of the Foggy Bottom student headcount and Foggy Bottom student full-time equivalent reported pursuant to Condition C-15 herein shall be conducted in a manner and by a firm previously approved by the Zoning Administrator and reported to the Advisory Committee. The audit shall be completed by January 10 of the year following each report submitted pursuant to Condition C-15 herein.*
- c. *Compliance with this condition shall be based upon the data reported for the most recent semester in either the Foggy Bottom Campus Plan Compliance Report required in Condition C-15 or in the Interim Foggy Bottom Campus Plan Compliance Report required by Condition C-16.*

GW Response:

	Fall 2007	Spring 2008
Foggy Bottom Student Headcount	18,394	17,511
Foggy Bottom Student Full-Time Equivalent (FTE)	16,248	15,361

For the methodology for calculation of Foggy Bottom campus student populations see Attachment A.

For a copy of the audit of fall 2007 Foggy Bottom student population called for in Condition C-4b, see Attachment B.

Condition C-5: Foggy Bottom Campus Faculty & Staff Population

Condition:

For the duration of this Plan, the Foggy Bottom faculty and staff population shall not exceed a total of 12,529 on a headcount basis, and 10,550 on a full-time equivalent basis.

- a. *For the purposes of these Conditions,*
 - i. *“Foggy Bottom faculty and staff headcount” shall include: regular full-time faculty and staff; regular part-time faculty and staff; wage account staff that are not Foggy Bottom students accounted for pursuant to Condition C-4; temporary part-time faculty (excluding part-time clinical faculty who are not paid employees of the University); affiliated faculty employed by the Medical Faculty Associates; and visiting instructional and research faculty. For the purposes of these Conditions, Foggy Bottom faculty and staff shall not include faculty and staff whose primary office locations are not on the Foggy Bottom campus; employees of non-GW owned or controlled entities which are located on the Foggy Bottom campus; and contractors that provide ancillary campus-related service functions who are not employees of the University.*
 - ii. *“Foggy Bottom faculty and staff full-time equivalent” shall be determined by assigning a fraction to part-time employees included in the Foggy Bottom faculty and staff headcount number based generally on the number of hours worked as compared to the standard full-time 40 hour work week.*
- b. *Compliance with this condition shall be based upon the data reported for the most recent semester in either the Foggy Bottom Campus Plan Compliance Report required in Condition C-15 or in the Interim Foggy Bottom Campus Plan Compliance Report required by Condition C-16, whichever is the most current.*

GW Response:

	Fall 2007	Spring 2008 ¹
Foggy Bottom Faculty & Staff Headcount	6,505	6,492
Foggy Bottom Faculty & Staff Full-Time Equivalent (FTE)	5,005	4,930

For the methodology for calculation of Foggy Bottom campus faculty and staff populations see Attachment C.

Note 1- Data as of February 22, 2008.

Condition C-6: On-Campus Undergraduate Student Housing

Condition:

For the duration of the Plan, the University shall make available on-campus beds for full-time Foggy Bottom undergraduate students equivalent to 70% of the full-time Foggy Bottom undergraduate student population up to an enrollment of 8,000, plus one bed per full-time Foggy Bottom undergraduate student over 8,000. Compliance with this condition shall be based upon the data reported for the most recent semester in either the Foggy Bottom Campus Plan Compliance Report required in Condition C-15 or in the Interim Foggy Bottom Campus Plan Compliance Report required by Condition C-16, whichever is the most current.

- a. *For the purposes of this Condition,*
 - i. *“full-time Foggy Bottom undergraduate students” shall be defined as follows:*
 - A. *Until the fall 2010 semester or until the completion and occupancy of the next University residence hall project proposed in accordance with the Foggy Bottom or Mount Vernon Campus Plans, whichever event first occurs, the term shall mean the number of students in the “Foggy Bottom/Mount Vernon Campus Total Student Body”¹ minus graduate students, first professionals (JDs and MDs), undergraduates taking fewer than 12 credit hours at the Foggy Bottom campus, non-degree students, full-time undergraduate study abroad students, undergraduate continuous enrollment students, and full-time undergraduate students accounted for under the Mount Vernon Campus Plan Order (BZA Order No. 16505), which does not differentiate between resident and non-resident students.*
 - B. *Once either of the above-described events occurs, the terms shall have the same meaning as above, except only full-time undergraduate students who reside on the Mount Vernon Campus plan will be subtracted from the “Foggy Bottom/Mount Vernon Campus Total Student Body.”*
 - ii. *The term “on-campus beds” shall include beds available to full-time Foggy Bottom undergraduate students in any property in which the University has an ownership, leasehold, or contractual interest, or beds otherwise occupied by full-time Foggy Bottom undergraduate students in fraternities, sororities, or other programs recognized by or affiliated with the University and located within the campus plan boundary.*

The University’s efforts with respect to this Condition shall be monitored by the Advisory Committee.

GW Response:

	Fall 2007	Spring 2008
Full-Time Foggy Bottom Undergraduate Students	8,321	7,794
On-Campus Beds Available to Full-Time Foggy Bottom Undergraduates	6,351 ¹	6,351 ¹
On-Campus Beds Occupied by Full-Time Foggy Bottom Undergraduates	5,805	5,567

University-Supplied Off-Campus Beds WITHIN the FB/WE Area²	945	938
University-Supplied Off-Campus Beds WITHIN the FB/WE Area Occupied by FT Foggy Bottom Undergraduates	468	509
University-Supplied Off-Campus Beds OUTSIDE the Foggy Bottom/West End Area	0	0
University-Supplied Off-Campus Beds OUTSIDE the Foggy Bottom/West End Area Occupied by FT Foggy Bottom Undergraduates	0	0

For the methodology supporting undergraduate student housing numbers see Attachment D.

Notes:

Note 1 – Based on the number of full-time Foggy Bottom Undergraduate Students, GW was required to make available to full-time Foggy Bottom Undergraduates 5,456 beds in spring 2008, and 5,921 beds in fall 2007.

Note 2 - Of the university supplied off-campus beds within the Foggy Bottom/West End area, only 746 and 739 of these beds (or units) were available to undergraduate students in fall 2007 and spring 2008, respectively.

**Foggy Bottom Campus Plan Interim Compliance Report
Foggy Bottom Campus Plan (2007)
(as outlined in Condition C-16)
April 15, 2008**

ATTACHMENTS

ATTACHMENT A – Methodology for Calculation of Student Populations

Foggy Bottom Student Headcount

	Fall 2007	Spring 2008
Foggy Bottom/Mount Vernon Campus Total Student Body	20,220	19,379
Less (minus):		
Study Abroad Students	514	603
Continuous Enrollment Students	345	331
Students that reside at the Mount Vernon Campus	425	410
Students that take all courses at the Mount Vernon Campus	51	10
Foggy Bottom faculty and staff accounted for under condition C-5 who are also enrolled in one ore more courses at the Foggy Bottom campus.	491	514
Foggy Bottom student headcount	18,394	17,511

Foggy Bottom student full-time equivalent

Determined by assigning a fraction to part-time students included in the Foggy Bottom student headcount number based on the number of credits they are taking compared to a full-time course load and adding the number of full time students. Currently, a full-time course load for undergraduates is 12 credits, and the full-time course load for graduate and professional students is 9 credits.

Spring 2008 Foggy Bottom Student Full Time Equivalent (FTE) – 15,361

Fall 2007 Foggy Bottom Student Full Time Equivalent (FTE) – 16,248

**Foggy Bottom Campus Plan Interim Compliance Report
Spring 2008**

ATTACHMENT B – Audit Report dated January 9, 2008, by Walker & Company, LLP

April 15, 2008

THE GEORGE WASHINGTON UNIVERSITY

FALL 2007 CENSUS DATA

and

Independent Accountant's Report



Walker & Company, LLP
Assurance, Business and Advisory Services



Walker & Company, LLP
Assurance, Business and Advisory Services

Independent Accountant's Report

To the Zoning Administrator
Department of Consumer and Regulatory Affairs
Government of the District of Columbia

We have examined the Fall 2007 Census Data submitted by The George Washington University (the University) to the District of Columbia Office of the Zoning Administrator in the University's November 20, 2007 Foggy Bottom Campus Plan Compliance Report. The University is responsible for the census data. Our responsibility is to express an opinion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence supporting the classification of students in the enrollment methodology used by the University to report on compliance with the Foggy Bottom Campus Plan Order, dated October 26, 2007, and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

In our opinion, the Census Data referred to above presents, in all material respects, the classification of students based on the enrollment methodology included in Note 1.

Walker & Company, LLP

January 9, 2008

**The George Washington University (GW) Census Data
Determination of Foggy Bottom Total Student Body Head Count
for Fall 2007**

Total GW Student Body Head Count	25,078
less: Students not enrolled in courses at either the Foggy Bottom or Mount Vernon campuses	<u>4,858</u>
Foggy Bottom/Mount Vernon Total Student Body Head Count	20,220
less: Study Abroad Students	514
Continuous Enrollment Students	345
Students that reside at the Mount Vernon Campus	425
Students that take all courses at the Mount Vernon Campus	51
Foggy Bottom faculty and staff enrolled in one or more courses at the Foggy Bottom Campus who are already included in counts for faculty and staff	<u>491</u>
Foggy Bottom Total Student Body Head Count	<u>18,394</u>
 Foggy Bottom Total Student Body Full-Time Equivalent	 16,248

See notes to census data and accountant's report

THE GEORGE WASHINGTON UNIVERSITY
NOTES TO CENSUS DATA
Fall 2007

1. Enrollment Methodology

The George Washington University (GW) defines the Total GW Student Body Head Count as all students, full-time and part-time, undergraduate, graduate and non-degree, enrolled in a creditable course at GW at the Foggy Bottom Campus, the Mount Vernon Campus, the Virginia Campus and other locations or via distance education. This total is reported to the U.S. Department of Education through the Integrated Post-Secondary Education Data System (IPEDS), the standard reporting mechanism for United States institutions of higher education. IPEDS defines those who are included and excluded from the official student enrollment counts.

GW derives the On Campus (Foggy Bottom/Mount Vernon) Total Student Body Head Count by extracting from the Total GW Student Body Head Count students who take courses at the Foggy Bottom or Mount Vernon campuses. Campus location is determined by the geographic designation for each course in which a student is enrolled.

GW derives the Foggy Bottom Total Student Body Head Count, consistently with Condition C-4(i) of the Foggy Bottom Campus Plan Zoning Order, dated October 26, 2007 (the "Zoning Order"), by subtracting from On Campus Total Student Body Head Count (i) students who are enrolled in a study program outside of the United States for the semester ("Study Abroad"), (ii) students who are taking no courses but are enrolled for administrative purposes allowing the student to maintain good standing for graduation ("Continuous Enrollment"), (iii) students that reside at the Mount Vernon Campus, (iv) students that take all their courses at the Mount Vernon Campus, and (v) Foggy Bottom faculty and staff accounted for under a separate section of the Zoning Order, condition C-5, who are also enrolled in one or more courses at the Foggy Bottom Campus.

GW derives the Foggy Bottom Total Student Body Full Time Equivalent, consistent with the Zoning Order, by counting students included in the Foggy Bottom Total Student Body Head Count once for each full-time student and as a fraction of full-time for a part-time student. The part-time student fraction is based on the number of credit hours constituting a full-time program for each classification of students. For undergraduates and non-degree students, a full-time program is 12 credit hours (thus a student taking 6 credit hours is counted as 0.5 FTE). For graduate students, a full-time program is 9 credit hours. For first professionals in the Law School, a full-time program is 12 credit hours. All first professional students in the School of Medicine and Health Sciences (MD candidates) are considered full-time.

Students enrolled at GW and included in the Total GW Student Body Head Count reported through IPEDS are tracked among the elements contained in the Banner system, GW's enterprise-wide database application from which the census data has been drawn. Attendees of any seminars and conferences who are not enrolled in a GW course are not maintained in the database and not reported to the U.S. Department of Education because they are not included in the IPEDS definition of students enrolled in creditable courses.

THE GEORGE WASHINGTON UNIVERSITY
NOTES TO CENSUS DATA
Fall 2007

There are no counts available for such attendees and they are thus excluded from the census data presented here and in the semi-annual reports to the Office of the Zoning Administrator.

2. Definitions

Student	An individual enrolled at GW as either an undergraduate, graduate, first professional (JD's and MD's), or any person enrolled in a creditable course offered by GW (e.g. foreign exchange and other non-degree students).
Enrollment	Students who are registered in at least one creditable course at GW are considered enrolled at GW.
Full Time Equivalent (FTE)	The number of full-time students (undergraduate, graduate, first professional and non-degree) and the total credit hours taken by part-time (including continuing research) students in each category divided by the relevant credit hours to be considered full-time (9 for graduate students and 12 for all others). All MD students are considered full-time.
Study Abroad	Students studying outside of the United States during the reporting period who pay full tuition and register for credit courses through GW. These students are considered to be in an affiliated program and are included in the students reported to the U.S. Department of Education. Students studying abroad in a non-GW program who pay only a nominal fee to GW are considered to be in an unaffiliated study abroad program and are excluded from the total student body under the IPEDS definition.
Continuous Enrollment	Students who are enrolled for administrative purposes but are not registered for, or taking any creditable courses.

ATTACHMENT C – Methodology for Calculation of Foggy Bottom Campus Faculty & Staff Population

Foggy Bottom Faculty and Staff Headcount

	Fall 2007 ¹	Spring 2008 ²
Summation of:		
Regular full-time faculty and staff	4,031	3,957
Regular part-time faculty and staff	481	350
Wage account staff that are not Foggy Bottom students accounted for pursuant to Condition C-4	570	780
Temporary part-time faculty (excluding part-time clinical faculty who are not paid employees of the University)	1,111	1,070
Affiliated faculty employed by the Medical Faculty Associates	202	201
Visiting instructional and research faculty	110	134
Foggy Bottom Faculty and Staff Headcount	6,505	6,492

Foggy Bottom Faculty and Staff Full-Time Equivalent

Determined by assigning a fraction to part-time employees included in the Foggy Bottom faculty and staff headcount number based generally on the number of hours worked as compared to the standard 40-hour work week.

Spring 2008 Foggy Bottom Faculty and Staff Full-Time Equivalent (FTE) – 4,930

Fall 2007 Foggy Bottom Faculty and Staff Full Time Equivalent (FTE) – 5,005

Notes:

Note 1 – Data as of November 1, 2007.

Note 2 – Data as of February 22, 2008

ATTACHMENT D – Methodology Supporting Undergraduate Student Housing Condition Numbers

Determining Full-Time Foggy Bottom Undergraduate Students

	Fall 2007	Spring 2008
Foggy Bottom/Mount Vernon Campus Total Student Body	20,220	19,379
Less (minus):		
Graduate students	7,329	6,973
First professionals (JDs, MDs)	2,368	2,338
Undergraduates taking fewer than 12 credits at the Foggy Bottom campus (and are not accounted for under the Mount Vernon Campus Plan Order, below)	179	301
Non-degree students	661	583
Full-time undergraduate study abroad students	505	589
Undergraduate continuous enrollment students	96	95
Full-time undergraduates accounted for under the Mount Vernon Campus Plan Order (which does not differentiate between resident and non-resident students)	761	706
Full-Time Foggy Bottom Undergraduate Students	8,321	7,794

On-Campus Beds Available to Full-Time Foggy Bottom Undergraduate Students

	Fall 2007	Spring 2008
Summation of:		
Beds available to undergraduate students in GW owned or leased properties within the campus plan boundary	6,326	6,326
Beds available to undergraduate students in fraternities, sororities, or other programs recognized by or affiliated with the University and located within the campus plan boundary	25	25
Total Number of On-Campus Beds Available to Undergraduates	6,351	6,351

On-Campus Beds Occupied by Full-Time Foggy Bottom Undergraduate Students – 5,567

Based on housing programs records of residence hall occupancy as of Census date (February 22, 2008)

Number of off-campus University-supplied beds within the Foggy Bottom/West End Area

SPRING 2008 DATA University supplied beds within Foggy Bottom/West End Area	Total Number of Beds Available (Spring 2008)	Available to Full-Time Foggy Bottom Undergraduates (Spring 2008)	Occupied by Full-time Foggy Bottom Undergraduates (Spring 2008)
City Hall, 950 24 th Street, NW	532	532	474
The Aston, 1129 New Hampshire Avenue, NW	0	0	0
Hall on Virginia Avenue, 2601 Virginia Avenue, NW	199	0	0
2144 F Street, NW	4	4	4
Columbia Plaza, VA Avenue NW between 23 rd & 24 th Streets	203 units	203 units	35 students
Totals	938	739	509

FALL 2007 DATA University supplied beds within Foggy Bottom/West End Area	Total Number of Beds Available (Fall 2007)	Available to Full-Time Foggy Bottom Undergraduates (Fall 2007)	Occupied by Full-time Foggy Bottom Undergraduates (Fall 2007)
City Hall, 950 24 th Street, NW	532	532	440
The Aston, 1129 New Hampshire Avenue, NW	0	0	0
Hall on Virginia Avenue, 2601 Virginia Avenue, NW	199	0	0
2144 F Street, NW	4	4	4
Columbia Plaza, VA Avenue NW between 23 rd & 24 th Streets	210 units	210 units	24 students
Totals	945	746	468

University Supplied Beds Outside the Foggy Bottom/West End Area, University Supplied Beds Available to Full-Time Undergraduates Outside the Foggy Bottom/West End Area and University Supplied Beds Outside the Foggy Bottom/West End Area Occupied by Full-Time Undergraduates

	Fall 2007	Spring 2008
University Supplied Beds Outside Foggy Bottom/West End Area	0	0
University Supplied Beds Outside Foggy Bottom/West End Area Occupied by Full-Time Undergraduates	0	0