

THE GEORGE
WASHINGTON
UNIVERSITY
WASHINGTON DC

April 15, 2009

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

VIA COURIER

Re: Foggy Bottom Campus Plan Interim Compliance Report

Office of Zoning:

Enclosed please find a copy of the University's Foggy Bottom Campus Plan 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 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
Associate Vice President for Real Estate,
The George Washington University

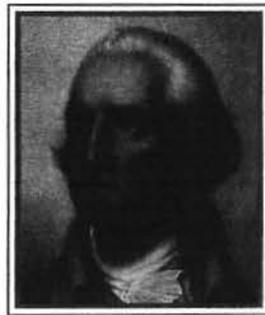
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District of Columbia
CASE NO. 06-11
EXHIBIT NO. 262

ZONING COMMISSION
District of Columbia
CASE NO.06-11
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THE GEORGE
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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, 2009

**Foggy Bottom Campus Plan Interim Compliance Report
Foggy Bottom Campus Plan (2007)
(as outlined in Condition C-16)
April 15, 2009**

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- Attachment B: Audit Report dated January 12, 2009, by Walker & Company, LLP**
- Attachment C: Methodology for Calculation of Foggy Bottom Campus Faculty & Staff Populations**
- Attachment D: Methodology Supporting Undergraduate Student Housing Numbers**

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 2008	Spring 2009
Foggy Bottom Student Headcount	18,380 ¹	17,343
Foggy Bottom Student Full-Time Equivalent (FTE)	16,225	15,219

Notes:

Note 1- Based upon the independent enrollment audit conducted by the certified public accounting firm Walker & Company LLC, approved by the Zoning Administrator, this count was revised January 5, 2008 to account for an error in computation whereby Foggy Bottom student headcount was under reported by 5 students.

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

For a copy of the audit of fall 2008 Foggy Bottom campus 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 2008	Spring 2009 ¹
Foggy Bottom Faculty & Staff Headcount	6,416	6,680
Foggy Bottom Faculty & Staff Full-Time Equivalent (FTE)	4,958	5,063

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

Note 1- Data as of the GW census date, February 20, 2009.

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 2008	Spring 2009
Full-Time Foggy Bottom Undergraduate Students	8,361	7,796
On-Campus Beds Available to Full-Time Foggy Bottom Undergraduates	6,340 ²	6,340 ²
On-Campus Beds Occupied by Full-Time Foggy Bottom Undergraduates	5,875	5,872 ¹

University-Supplied Off-Campus Beds WITHIN the FB/WE Area³	969	949
University-Supplied Off-Campus Beds WITHIN the FB/WE Area Occupied by FT Foggy Bottom Undergraduates	509	448
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 – In addition GW housed 60 part time undergraduates in Foggy Bottom residence halls in Spring 2009. These part time students are typically those completing their last semester at GW, exchange students, or students with medical or personal conditions that preclude full time attendance during a given semester.

Note 2 – Based on the number of full-time Foggy Bottom Undergraduate Students, GW was required to make available to full-time Foggy Bottom Undergraduates 5,499 beds in spring 2009, and 5,961 beds in fall 2008.

Note 3 - Of the university supplied off-campus beds within the Foggy Bottom/West End area, only 487 and 439 of these beds (or units) were available to undergraduate students in fall 2008 and spring 2009, respectively.

**Foggy Bottom Campus Plan Interim Compliance Report
Foggy Bottom Campus Plan (2007)
(as outlined in Condition C-16)
April 15, 2009**

ATTACHMENTS

ATTACHMENT A – Methodology for Calculation of Student Populations

Foggy Bottom Student Headcount

	Fall 2008	Spring 2009
Foggy Bottom/Mount Vernon Campus Total Student Body	20,001	19,181
Less (minus):		
Study Abroad Students	349	543
Continuous Enrollment Students	340	264
Students that reside at the Mount Vernon Campus	406	398
Students that take all courses at the Mount Vernon Campus	64	40
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.	462 ¹	623
Foggy Bottom student headcount	18,380¹	17,313

Notes:

Note 1- Based upon the independent enrollment audit conducted by the certified public accounting firm Walker & Company LLC, approved by the Zoning Administrator, this count was revised January 5, 2008 to account for an error in computation whereby Foggy Bottom student headcount was under reported by 5 students.

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 2009 Foggy Bottom Student Full Time Equivalent (FTE) – 15,219

Fall 2008 Foggy Bottom Student Full Time Equivalent (FTE) – 16,225

ATTACHMENT B – Audit Report dated January 12, 2009, by Walker & Company, LLP

THE GEORGE WASHINGTON UNIVERSITY

FALL 2008 CENSUS DATA

and

Independent Accountant's Report



Walker & Company, LLP
Assurance. Business and Advisory Services

The George Washington University

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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 2008 Census Data submitted by The George Washington University (GW) to the District of Columbia Office of the Zoning Administrator on November 20, 2008. GW 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 GW to report on compliance with the 2007 Foggy Bottom Campus Plan Zoning Order, dated October 26, 2007 (the "Zoning Order") 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 "Foggy Bottom Student Head Count" and "Foggy Bottom Full-Time Equivalent" as defined in the Zoning Order, based on the enrollment methodology described in Note 2.

Walker & Co. LLP

January 12, 2009

**The George Washington University (GW) Census Data
Determination of Foggy Bottom Total Student Body Head Count
for Fall 2008**

Total GW Student Body Head Count	25,116
less: Students not enrolled in courses at either the Foggy Bottom or Mount Vernon campuses	<u>5,115</u>
Foggy Bottom/Mount Vernon Total Student Body Head Count	20,001
less: Study Abroad Students	(349)
Continuous Enrollment Students	(340)
Students residing at the Mount Vernon Campus	(406)
Students taking all courses at the Mount Vernon Campus	(64)
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>(462)</u>
Foggy Bottom Total Student Body Head Count	<u>18,380</u>
 Foggy Bottom Total Student Body Full-Time Equivalents	 <u>16,225</u>

See notes to census data and accountant's report

THE GEORGE WASHINGTON UNIVERSITY
NOTES TO CENSUS DATA
Fall 2008

Note 1 Background

The George Washington University (GW) has agreed to certain limits on various categories of student enrollment in connection with the request for zoning variances for its various real estate projects. These limits are carefully defined in the GW Zoning Order. This Zoning Order also outlines the manner in which the students are to be counted in categories on which limits have been placed. The provisions of the Zoning Orders are monitored by the Zoning Administrator for the District of Columbia.

Note 2 Enrollment Methodology

The George Washington University 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 (Education) through the Integrated Post-Secondary Education Data System (IPEDS), the standard reporting mechanism for institutions of higher education within the United States. IPEDS defines parameters for including or excluding students from the official student enrollment counts.

GW derives the On Campus (Foggy Bottom/Mount Vernon) Total Student Body Head Count by subtracting from the Total GW Student Body Head Count students not enrolled in 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 (the Head Count), consistent 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 enrolled in study programs outside of the United States for the semester ("Study Abroad"), (ii) students taking no courses who are enrolled for administrative purposes allowing the student to maintain good standing for graduation ("Continuous Enrollment"), (iii) students residing at the Mount Vernon Campus, (iv) students taking courses only 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.

Two of the amounts shown in the Census Data from which the Head Count was derived were adjusted by GW. Out of 25,116 records reported, five records were included in more than one category which are excluded from the Head Count as compared to those initially filed by GW. Five students that were faculty and staff accounted for under Condition C-5 of the Zoning Order were also counted and excluded from the Head Count as Continuous Enrollment students when initially reported by the University. The effect of these adjustments increases the Head Count by five, and these adjustments are reflected in the University's data shown on page two.

THE GEORGE WASHINGTON UNIVERSITY
NOTES TO CENSUS DATA
Fall 2008

Note 2 Enrollment Methodology (continued)

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 was drawn. Attendees of any seminars and conferences not enrolled in a GW course are not maintained in the database and not reported to Education because they are not included in the IPEDS definition of students enrolled in creditable courses.

There were 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.

Note 3 Definitions

Student	An individual enrolled at GW as either an undergraduate, graduate, first professional (JD's and MD's), or persons enrolled in creditable courses offered by GW (e.g., foreign exchange and other non-degree students).
Enrollment	Students 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.

THE GEORGE WASHINGTON UNIVERSITY
NOTES TO CENSUS DATA
Fall 2008

Note 3 Definitions (Continued)

- | | |
|------------------------------|---|
| Study Abroad | Students studying outside of the United States during the 2008 Fall Semester registering and paying full tuition for credit courses through GW. These students are considered to be in affiliated programs and included in the students reported to Education. Students studying abroad in non-GW programs paying only nominal fees to GW are considered to be in unaffiliated study abroad programs and are excluded from the total student body under the IPEDS definition. |
| Continuous Enrollment | Students enrolled for administrative purposes but 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 2008 ¹	Spring 2009 ²
Summation of:		
Regular full-time faculty and staff	4,025	4,066
Regular part-time faculty and staff	331	337
Wage account staff that are not Foggy Bottom students accounted for pursuant to Condition C-4	706	833
Temporary part-time faculty (excluding part-time clinical faculty who are not paid employees of the University)	1,018	1,099
Affiliated faculty employed by the Medical Faculty Associates	197	196
Visiting instructional and research faculty	139	149
Foggy Bottom Faculty and Staff Headcount	6,416	6,680

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 2009 Foggy Bottom Faculty and Staff Full-Time Equivalent (FTE) – 5,063

Fall 2008 Foggy Bottom Faculty and Staff Full Time Equivalent (FTE) – 4,958

Notes:

Note 1 – Data as of November 1, 2008.

Note 2 – Data as of February 20, 2009

ATTACHMENT D – Methodology Supporting Undergraduate Student Housing Condition Numbers

Determining Full-Time Foggy Bottom Undergraduate Students

	Fall 2008	Spring 2009
Foggy Bottom/Mount Vernon Campus Total Student Body	20,001	19,181
Less (minus):		
Graduate students	7,286	6,865
First professionals (JDs, MDs)	2,400	2,368
Undergraduates taking fewer than 12 credits at the Foggy Bottom campus (and are not accounted for under the Mount Vernon Campus Plan Order, below)	173	322
Non-degree students	610	573
Full-time undergraduate study abroad students	344	530
Undergraduate continuous enrollment students	88	64
Full-time undergraduates accounted for under the Mount Vernon Campus Plan Order (which does not differentiate between resident and non-resident students)	739	663
Full-Time Foggy Bottom Undergraduate Students	8,361	7,796

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

	Fall 2008	Spring 2009
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	14	14
Total Number of On-Campus Beds Available to Undergraduates	6,340	6,340

On-Campus Beds Occupied by Full-Time Foggy Bottom Undergraduate Students – 5,872

Based on housing programs records of residence hall occupancy as of census date (February 20, 2009)

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

SPRING 2009 DATA University supplied beds within Foggy Bottom/West End Area	Total Number of Beds Available (Spring 2009)	Available to Full-Time Foggy Bottom Undergraduates (Spring 2009)	Occupied by Full-time Foggy Bottom Undergraduates (Spring 2009)
City Hall, 950 24 th Street, NW	498	435	435
The Aston, 1129 New Hampshire Avenue, NW	118	0	0
Hall on Virginia Avenue, 2601 Virginia Avenue, NW	192	0	0
2144 F Street, NW	4	4	4
Columbia Plaza, VA Avenue NW between 23 rd & 24 th Streets	137 units	0 units ¹	9 students ¹
Totals	949	439	448

FALL 2008 DATA University supplied beds within Foggy Bottom/West End Area	Total Number of Beds Available (Fall 2008)	Available to Full-Time Foggy Bottom Undergraduates (Fall 2008)	Occupied by Full-time Foggy Bottom Undergraduates (Fall 2008)
City Hall, 950 24 th Street, NW	498	483	483
The Aston, 1129 New Hampshire Avenue, NW	118	0	0
Hall on Virginia Avenue, 2601 Virginia Avenue, NW	192	0	0
2144 F Street, NW	4	4	4
Columbia Plaza, VA Avenue NW between 23 rd & 24 th Streets	157 units	0 units ¹	22 students ¹
Totals	969	487	509

Notes:

Note 1 – As of August 1, 2008, full time Foggy Bottom undergraduates were no longer referred to Columbia Plaza. Therefore this facility was no longer ‘available’ to full time undergraduates. However, pursuant to condition P-8, undergraduate students residing in Columbia Plaza as of August 1, 2008 are permitted to remain residents of Columbia Plaza until they graduate. Such student residents numbered 22 in fall 2008 and decreased to 9 in spring 2009.

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 2008	Spring 2009
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