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April 13, 2010

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
Senior Associate Vice President for Operations
The George Washington University

OFFICE OF THE
EXECUTIVE
VICE PRESIDENT

2121 I STREET, NW
WASHINGTON, DC 20052
202-994-6600
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ZONING COMMISSION
District of Columbia

CASE NO. 06-12

EXHIBIT NO. 250

ZONING COMMISSION
District of Columbia
CASE NO.06-12
EXHIBIT NO.250



THE GEORGE
WASHINGTON
UNIVERSITY

WASHINGTON DC

**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, 2010

**Foggy Bottom Campus Plan Interim Compliance Report
Foggy Bottom Campus Plan (2007)
(as outlined in Condition C-16)
April 15, 2010**

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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 2009	Spring 2010 ¹
Foggy Bottom Student Headcount	18,479 ²	17,503
Foggy Bottom Student Full-Time Equivalent (FTE)	16,473 ²	15,483

Notes:

Note 1 - Data as of the GW census date, February 19, 2010.

Note 2 – As a result of the independent enrollment audit conducted by the certified public accounting firm Walker & Company LLC (as approved by the Zoning Administrator) this count was revised January 11, 2010. Pursuant to methodology, nineteen faculty and staff (12 FTE), originally erroneously included in the student headcount were deducted as they were accounted for under condition C-5 of the Zoning Order.

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

For a copy of the audit of fall 2009 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 2009	Spring 2010 ¹
Foggy Bottom Faculty & Staff Headcount	6,639	6,742
Foggy Bottom Faculty & Staff Full-Time Equivalent (FTE)	5,114	5,143

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 19, 2010.

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

GW Response:

	Fall 2009	Spring 2010
Full-Time Foggy Bottom Undergraduate Students	8,707	8,021
On-Campus Beds Available to Full-Time Foggy Bottom Undergraduates	6,829 ²	6,829 ²
On-Campus Beds Occupied by Full-Time Foggy Bottom Undergraduates	6,239	5,696 ¹

University-Supplied Off-Campus Beds WITHIN the FB/WE Area³	814	806
University-Supplied Off-Campus Beds WITHIN the FB/WE Area Occupied by FT Foggy Bottom Undergraduates	371	325
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 109 part time undergraduates in Foggy Bottom residence halls in Spring 2010. 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 5,621 beds in spring 2010, and 6,307 beds in fall 2009.

Note 3 – Of the university supplied off-campus beds within the Foggy Bottom/West End area, only 390 of these beds (or units) were available to undergraduate students in fall 2009 and spring 2010.

**Foggy Bottom Campus Plan Interim Compliance Report
Foggy Bottom Campus Plan (2007)
(as outlined in Condition C-16)
April 15, 2010**

ATTACHMENTS

ATTACHMENT A – Methodology for Calculation of Student Populations

Foggy Bottom Student Headcount

	Fall 2009	Spring 2010
Foggy Bottom/Mount Vernon Campus Total Student Body	20,327	19,425
Less (minus):		
Study Abroad Students	387	573
Continuous Enrollment Students	292	280
Students that reside at the Mount Vernon Campus	411	394
Students that take all courses at the Mount Vernon Campus	124	116
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.	634 ¹	559
Foggy Bottom student headcount	18,479¹	17,503

Note 1 – As a result of the independent enrollment audit conducted by the certified public accounting firm Walker & Company LLC (as approved by the Zoning Administrator) this count was revised January 11, 2010. Pursuant to methodology, nineteen faculty and staff (12 FTE), originally erroneously included in the student headcount were deducted as they were accounted for under condition C-5 of the Zoning Order.

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 2010 Foggy Bottom Student Full Time Equivalent (FTE) – 15,483
Fall 2009 Foggy Bottom Student Full Time Equivalent (FTE) – 16,473¹

ATTACHMENT B – Audit Report dated January 11, 2010, by Walker & Company, LLP

THE GEORGE WASHINGTON UNIVERSITY

FALL 2009 CENSUS DATA

and

Independent Accountant's Report



Walker & Company, LLP
Assurance, Business and Advisory Services

THE GEORGE WASHINGTON UNIVERSITY

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Walker & Co., LLP

Assurance, Business and Advisory Services

Independent Accountant's Report

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

We have examined the Fall 2009 Census Data submitted by The George Washington University (GW) to the District of Columbia Office of the Zoning Administrator on November 20, 2009. 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 11, 2010

**The George Washington University (GW) Census Data
Determination of Foggy Bottom Total Student Body Head Count
for Fall 2009**

Total GW Student Body Head Count	25,061
Less: Students not enrolled in courses at either the Foggy Bottom or Mount Vernon campuses	4,734
Foggy Bottom/Mount Vernon Total Student Body Head Count	20,327
Less: Study Abroad Students	387
Continuous Enrollment Students	292
Students residing at the Mount Vernon Campus	411
Students taking all courses at the Mount Vernon Campus	124
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	634
Foggy Bottom Total Student Body Head Count	18,479
 Foggy Bottom Total Student Body Full-Time Equivalents	 16,473

See notes to census data and accountant's report.

THE GEORGE WASHINGTON UNIVERSITY
NOTES TO CENSUS DATA
Fall 2009

NOTE 1 BACKGROUND

The George Washington University (GW or University) 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.

Of the 634 Foggy Bottom faculty and staff enrolled in one or more courses at GW, seventeen are campus housing residents and two are Mount Vernon commuters. Nineteen faculty and staff were originally included in the Head Count as Full Time Equivalents when Census Data was initially reported by GW under

**THE GEORGE WASHINGTON UNIVERSITY
NOTES TO CENSUS DATA
Fall 2009**

NOTE 2 ENROLLMENT METHODOLOGY (Continued)

the Zoning Order. These faculty and staff members have been excluded from the head count since they have been accounted for under Condition C-5 of the Zoning Order. The effect of this adjustment decreases the Head Count by 19 and the FTE count by 12. This is reflected in the University's Census Data shown on page two.

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.

THE GEORGE WASHINGTON UNIVERSITY
NOTES TO CENSUS DATA
 Fall 2009

NOTE 3 DEFINITIONS (Continued)

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 2009 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 2009 ¹	Spring 2010 ²
Summation of:		
Regular full-time faculty and staff	4,107	4,120
Regular part-time faculty and staff	328	330
Wage account staff that are not Foggy Bottom students accounted for pursuant to Condition C-4	699	739
Temporary part-time faculty (excluding part-time clinical faculty who are not paid employees of the University)	1,116	1,173
Affiliated faculty employed by the Medical Faculty Associates	252	252
Visiting instructional and research faculty	137	128
Foggy Bottom Faculty and Staff Headcount	6,639	6,742

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 2010 Foggy Bottom Faculty and Staff Full-Time Equivalent (FTE) – 5,143

Fall 2009 Foggy Bottom Faculty and Staff Full Time Equivalent (FTE) – 5,114

Notes:

Note 1 – Data as of October 9, 2009

Note 2 – Data as of February 19, 2010

ATTACHMENT D – Methodology Supporting Undergraduate Student Housing Condition Numbers

Determining Full-Time Foggy Bottom Undergraduate Students

	Fall 2009	Spring 2010
Foggy Bottom/Mount Vernon Campus Total Student Body	20,327	19,425
Less (minus):		
Graduate students	7,579	7,169
First professionals (JDs, MDs)	2,356	2,320
Undergraduates taking fewer than 12 credits at the Foggy Bottom campus (and are not accounted for under the Mount Vernon Campus Plan Order, below)	167	330
Non-degree students	651	579
Full-time undergraduate study abroad students	379	547
Undergraduate continuous enrollment students	77	71
Full-time undergraduate students who reside on the Mount Vernon campus ²	411 ¹	388
Full-Time Foggy Bottom Undergraduate Students	8,707	8,021

Note 1 – Per Condition 6 the completion and occupation of the new South Hall residence hall in the fall of 2009 initiates the change in methodology that did not originally differentiate between Mount Vernon resident and non-resident students. The new methodology triggered by Condition 6 deducts only Mount Vernon residents from the Foggy Bottom/Mount Vernon Campus Total Student Body.

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

	Fall 2009	Spring 2010
Summation of:		
Beds available to undergraduate students in GW owned or leased properties within the campus plan boundary	6,808	6,808
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	21	21
Total Number of On-Campus Beds Available to Undergraduates	6,829	6,829

On-Campus Beds Occupied by Full-Time Foggy Bottom Undergraduate Students – 5,696
 Based on housing programs records of residence hall occupancy as of census date (February 19, 2010)

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

SPRING 2010 DATA University supplied beds within Foggy Bottom/West End Area	Total Number of Beds Available (Spring 2010)	Available to Full-Time Foggy Bottom Undergraduates (Spring 2010)	Occupied by Full-time Foggy Bottom Undergraduates (Spring 2010)
City Hall, 950 24 th Street, NW	386	386	320
The Aston, 1129 New Hampshire Avenue, NW	119	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	105 units	0 units ²	1 student ²
Totals	806	390	325

FALL 2009 DATA University supplied beds within Foggy Bottom/West End Area	Total Number of Beds Available (Fall 2009)	Available to Full-Time Foggy Bottom Undergraduates (Fall 2009)	Occupied by Full-time Foggy Bottom Undergraduates (Fall 2009)
City Hall, 950 24 th Street, NW	386	386	366
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	114 units	0 units ²	1 student ²
Totals	814	390	371

Notes:

Note 2 – As of August 1, 2008, full time Foggy Bottom undergraduates were no longer assigned to Columbia Plaza. Therefore, this facility was no longer ‘available’ to full time undergraduate. One full time undergraduate, however, was a resident of Columbia Plaza under the GW student housing program as of February 19, 2010 and, pursuant to Condition P-8, is permitted to remain a resident of Columbia Plaza until that student graduates.

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 2009	Spring 2010
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