
**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, 2026

**Foggy Bottom Campus Plan Interim Compliance Report
Foggy Bottom Campus Plan (2007)
(as outlined in Condition C-16)
April 15, 2026**

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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 2025 ¹	Spring 2026 ²
Foggy Bottom Student Headcount	17,663	16,269
Foggy Bottom Student Full-Time Equivalent (FTE)	16,345	14,930

Notes:

Note 1 - Data as of the GW census date, October 4, 2025.

Note 2 - Data as of the GW census date, February 21, 2026.

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 2025 ¹	Spring 2026 ²
Foggy Bottom Faculty & Staff Headcount	6,489	6,363
Foggy Bottom Faculty & Staff Full-Time Equivalent (FTE)	5,276	5,179

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

Notes:

Note 1 - Data as of the GW census date, October 4, 2025.

Note 2 - Data as of the GW census date, February 21, 2026.

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 2025 ¹	Spring 2026 ²
Full-Time Foggy Bottom Undergraduate Students	8,743	7,839
On-Campus Beds Available to Full-Time Foggy Bottom Undergraduates³	6,620 ³	6,620³
On-Campus Beds Occupied by Full-Time Foggy Bottom Undergraduates⁴	5,947	5,387

University-Supplied Off-Campus Beds WITHIN the FB/WE Area	5	5
University-Supplied Off-Campus Beds WITHIN the FB/WE Area Occupied by FT Foggy Bottom Undergraduates	0	0
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 - Data as of the GW census date, October 4, 2025.

Note 2 - Data as of the GW census date, February 21, 2026.

Note 3 - Beds exceed the requirement (70% of 8,000 plus one bed per FT FB UG student over 8,000).

Foggy Bottom Campus Plan Interim Compliance Report
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Foggy Bottom Campus Plan Interim Compliance Report
Foggy Bottom Campus Plan (2007)
(as outlined in Condition C-16)
April 15, 2026

ATTACHMENTS

ATTACHMENT A – Methodology for Calculation of Student Populations

Foggy Bottom Student Headcount

	Fall 2025 ¹	Spring 2026 ²
Foggy Bottom/Mount Vernon Campus Total Student Body	19,572	18,396
Sum (plus):		
Foggy Bottom resident undergraduate students that take zero credits on the Foggy Bottom Campus	8	1
Foggy Bottom resident graduate students that take zero credits on the Foggy Bottom Campus	0	0
Less (minus):		
Study Abroad Students	348	794
Continuous Enrollment Students	410	331
Students that reside at the Mount Vernon Campus	652	630
Students that take all courses at the Mount Vernon Campus	235	22
Foggy Bottom faculty and staff accounted for under condition C-5 who are also enrolled in one or more courses at the Foggy Bottom campus.	250	299
School Without Walls students	22	22
Foggy Bottom student headcount	17,663	16,269

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.

Fall 2025 Foggy Bottom Student Full Time Equivalent (FTE) – 16,345

Spring 2026 Foggy Bottom Student Full Time Equivalent (FTE) – 14,930

Notes:

Note 1 - Data as of the GW census date, October 4, 2025.

Note 2 - Data as of the GW census date, February 21, 2026.

Foggy Bottom Campus Plan Interim Compliance Report
April 15, 2026

ATTACHMENT B – Audit Report dated January 14, 2026 by McConnell & Jones, LLP

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Fall 2025 Census Data
and Independent Accountant's Report

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McConnell
Jones

Independent Accountant's Report

To the Zoning Administrator
Department of Buildings
Government of the District of Columbia

We have examined the Fall 2025 Census Data submitted by The George Washington University (GW) to the District of Columbia Office of the Zoning Administrator (Zoning Administrator) on November 20, 2025, to determine the University's compliance with the specified requirements of Condition C-4(a) of the 2007 Foggy Bottom Campus Plan Order, Z.C. Cases 06-11 and 06-12 (the Zoning Order), in all material respects. GW's management is responsible for compliance with the Zoning Order. Our responsibility is to express an opinion on GW's compliance with the Zoning Order based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the Foggy Bottom Student Head Count and Foggy Bottom Student Full-Time Equivalent reported to the Zoning Administrator comply with the requirement of the Zoning Order, in all material respects. An examination involves performing procedures to obtain evidence about census data. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of the census data submitted to the Zoning Administrator, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Our examination does not provide a legal determination on GW's compliance with the specified requirements noted in the first paragraph of our report.

In our opinion, the Census Data referred to above including the "Foggy Bottom Student Head Count" and "Foggy Bottom Student Full-Time Equivalent" as required by the Zoning Order and the enrollment methodology described in Note 2 are fairly stated, in all material respects.

This report is intended solely for the information and use of GW and the Zoning Administrator and is not intended to be and should not be used by anyone other than the specified parties.

McConnell Jones LLP

Washington, DC
January 14, 2026

5101 Wisconsin Ave., NW
Suite 210
Washington, DC 20016
Phone: 202.207.3570

WWW.MCCONNELLJONES.COM

THE GEORGE WASHINGTON UNIVERSITY

FALL 2025 CENSUS DATA

and Determination of Foggy Bottom Student Head Count

Total GW Student Body Head Count	24,529
Less: Students enrolled in courses Off Campus and at the Virginia campuses and not in GW Housing and taking zero credit at FB	<u>4,957</u>
Foggy Bottom/Mount Vernon Total Student Body Head Count	19,572
Plus: Foggy Bottom resident undergraduate and graduate students in GW Housing who take zero credits on the Foggy Bottom Campus	8
Less: Study Abroad Students	348
Continuous Enrollment Students	410
Students residing at the Mount Vernon Campus	652
Students taking all courses at the Mount Vernon Campus	235
School Without Walls students	22
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>250</u>
Foggy Bottom Total Student Body Head Count	<u>17,663</u>
Foggy Bottom Total Student Body Full-Time Equivalent	<u>16,345</u>

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Fall 2025 Census Data

Notes To Census Data

NOTE 1 BACKGROUND

The George Washington University ('GW' or 'the University') has agreed to certain limits on various categories of student enrollment at its Foggy Bottom campus in connection with the request for zoning variances for its various real estate projects. These limits are carefully defined in the GW Foggy Bottom Campus Plan Zoning Order dated October 26, 2007, as modified on May 4, 2015, (the Zoning Order). This Zoning Order outlines the manner in which the students are to be counted in categories on which limits have been placed. The provisions of the Zoning Order are monitored by the Zoning Administrator for the District of Columbia.

The University draws its census data from the Banner System, GW's enterprise-wide database application and reports its Total Student Body Head Count 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. GW reports its Total Student Head Count to the Office of the Zoning Administrator from the census data included in its IPEDS report to Education.

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). 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 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

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Fall 2025 Census Data

Notes To Census Data

NOTE 2 ENROLLMENT METHODOLOGY (CONTINUED)

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 law degree students in the Law School (JD candidates), a full-time program is 12 credit hours. All 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 in elements of the Banner system. Attendees of any seminars and conferences not enrolled in a GW course are not maintained in the Banner 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.

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Fall 2025 Census Data

Notes To Census Data

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.
Study Abroad	Students studying outside of the United States during the 2023 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.
School Without Walls	The School Without Walls (SWW) is a District of Columbia public high school located on District-owned property within the boundaries of GW's Foggy Bottom Campus. Under a long-standing relationship between GW and SWW, students from the high school are permitted to take courses at GW. SWW students taking such courses are included in the data reported to the US Department of Education and the Total GW Student Body Head Count. However, these students are excluded from Foggy Bottom Total Student Body Head Count as reported under the Zoning Order since the SWW is located in the Foggy Bottom neighborhood.
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 2025 ¹	Spring 2026 ²
Summation of:		
Regular full-time faculty and staff	4,358	4,275
Regular part-time faculty and staff	180	181
Wage account staff that are not Foggy Bottom students accounted for pursuant to Condition C-4	437	376
Temporary part-time faculty (excluding part-time clinical faculty who are not paid employees of the University)	1,061	1,082
Affiliated faculty employed by the Medical Faculty Associates	359	358
Visiting instructional and research faculty	94	91
Foggy Bottom Faculty and Staff Headcount	6,489	6,363

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.

Fall 2025 Foggy Bottom Faculty and Staff Full-Time Equivalent (FTE) – 5,276

Spring 2026 Foggy Bottom Faculty and Staff Full-Time Equivalent (FTE) – 5,179

Notes:

Note 1 - Data as of the GW census date, October 4, 2025.

Note 2 - Data as of the GW census date, February 21, 2026.

ATTACHMENT D – Methodology Supporting Undergraduate Student Housing Condition Numbers

Determining Full-Time Foggy Bottom Undergraduate Students

	Fall 2025 ¹	Spring 2026 ²
Foggy Bottom/Mount Vernon Campus Total Student Body	19,572	18,396
Sum (plus):		
Foggy Bottom resident undergraduate students that take zero credits on Foggy Bottom Campus	8	1
Foggy Bottom resident graduate students that take zero credits on the Foggy Bottom Campus	0	0
Less (minus):		
Graduate students	6,465	5,998
First professionals (JDs, MDs)	2,414	2,219
Undergraduates taking fewer than 12 credits at the Foggy Bottom campus (and are not accounted for under the Mount Vernon Campus Plan Order, below)	702	717
Non-degree students	250	218
Full-time undergraduate study abroad student's	300	715
Undergraduate continuous enrollment students	74	74
Full-time undergraduate students who reside on the Mount Vernon campus	632	617
Full-Time Foggy Bottom Undergraduate Students	8,743	7,839

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

	Fall 2025 ¹	Spring 2026 ²
Summation of:		
Beds available to undergraduate students in GW owned or leased properties within the campus plan boundary	6,605	6,605
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	15	15
Total Number of On-Campus Beds Available to Undergraduates	6,620	6,620

On-Campus Beds Occupied by Full-Time Foggy Bottom Undergraduate Students – 5,387

Based on housing programs records of residence hall occupancy as of census date February 21, 2026.

Notes:

Note 1 - Data as of the GW census date, October 4, 2025.

Note 2 - Data as of the GW census date, February 21, 2026.

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

FALL 2025 DATA ¹ University supplied beds within Foggy Bottom/West End Area	Total Number of Beds Available (Fall 2025)	Available to Full-Time Foggy Bottom Undergraduates (Fall 2025)	Occupied by Full-time Foggy Bottom Undergraduates (Fall 2025)
2144 F Street, NW Columbia Plaza, 2400 Virginia Avenue, NW	4 1	0 0	0 0
Totals	5	0	0

SPRING 2026 DATA ² University supplied beds within Foggy Bottom/West End Area	Total Number of Beds Available (Spring 2026)	Available to Full-Time Foggy Bottom Undergraduates (Spring 2026)	Occupied by Full-time Foggy Bottom Undergraduates (Spring 2026)
2144 F Street, NW Columbia Plaza, 2400 Virginia Avenue, NW	4 1	0 0	0 0
Totals	5	0	0

Notes:

Note 1 - Data as of the GW census date, October 4, 2025.

Note 2 - Data as of the GW census date, February 21, 2026.

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 2025	Spring 2026
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