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**THE GEORGE  
WASHINGTON  
UNIVERSITY**

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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, 2020**

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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. Notwithstanding the foregoing, students who reside in on-campus beds on the Foggy Bottom Campus shall be counted toward the Foggy Bottom student headcount.

Note that students taking all of their courses at the Corcoran are not specifically deducted from this number as they are not included in the “Foggy Bottom/Mount Vernon Campus Total Student Body” by virtue of their courses not being located on the Foggy Bottom or Mount Vernon Campuses.<sup>1</sup>

- 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 2019 <sup>2</sup>	Spring 2020 <sup>3</sup>
<b>Foggy Bottom Student Headcount</b>	18,121	<b>17,129</b>
<b>Foggy Bottom Student Full-Time Equivalent (FTE)</b>	16,375	<b>15,187</b>

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

For a copy of the audit of Fall 2019 Foggy Bottom campus student population called for in Condition C-4b, see Attachment B.

**Notes:**

Note 1 - Language that is underscored represents new text that was approved on May 4, 2015 per Zoning Commission Case no. 06-11N.

Note 2 - Data as of the GW census date, October 5, 2019.

**Note 3 - Data as of the GW census date, February 22, 2020.**

**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 2019 <sup>1</sup>	Spring 2020 <sup>2</sup>
<b>Foggy Bottom Faculty &amp; Staff Headcount</b>	6,645	<b>6,851</b>
<b>Foggy Bottom Faculty &amp; Staff Full-Time Equivalent (FTE)</b>	5,264	<b>5,366</b>

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 5, 2019.

Note 2 - Data as of the GW census date, February 22, 2020.

**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"<sup>1</sup> 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 2019 <sup>1</sup>	Spring 2020 <sup>2</sup>
<b>Full-Time Foggy Bottom Undergraduate Students</b>	9,053	<b>8,161</b>
<b>On-Campus Beds Available to Full-Time Foggy Bottom Undergraduates</b>	7,073	<b>7,073</b>
<b>On-Campus Beds Occupied by Full-Time Foggy Bottom Undergraduates<sup>3</sup></b>	6,345	<b>6,116</b>

<b>University-Supplied Off-Campus Beds WITHIN the FB/WE Area<sup>4</sup></b>	257	<b>247</b>
<b>University-Supplied Off-Campus Beds WITHIN the FB/WE Area Occupied by FT Foggy Bottom Undergraduates</b>	0	<b>0</b>
<b>University-Supplied Off-Campus Beds OUTSIDE the Foggy Bottom/West End Area</b>	0	<b>0</b>
<b>University-Supplied Off-Campus Beds OUTSIDE the Foggy Bottom/West End Area Occupied by FT Foggy Bottom Undergraduates</b>	0	<b>0</b>

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

**Notes:**

Note 1 - Data as of the GW census date, October 5, 2019.

**Note 2 - Data as of the GW census date, February 22, 2020.**

**Note 3** – GW housed 103 part time undergraduates in Foggy Bottom residence halls in Fall 2019. These students are not included in the full-time GW bed counts as they are taking less than 12 credits. These students are typically completing their last semester at GW, are exchange students, or students with medical or personal conditions that preclude full time attendance during a given semester.

**Note 4**– Of the university supplied off-campus beds within the Foggy Bottom/West End area. Zero (0) beds were available to undergraduate students in Fall 2019. The remaining beds were made available to GW graduate students.

**ATTACHMENT A – Methodology for Calculation of Foggy Bottom Campus Student Populations**

**Foggy Bottom Student Headcount**

	Fall 2019 <sup>1</sup>	Spring 2020 <sup>2</sup>
Foggy Bottom/Mount Vernon Campus Total Student Body <sup>3</sup>	19,871	<b>18,925</b>
Sum (plus):		
Foggy Bottom resident undergraduate students that take zero credits on the Foggy Bottom Campus	5	<b>6</b>
Foggy Bottom resident graduate students that take zero credits on the Foggy Bottom Campus	18	<b>14</b>
Less (minus):		
Study Abroad Students	479	<b>618</b>
Continuous Enrollment Students	362	<b>283</b>
Students that reside at the Mount Vernon Campus	618	<b>606</b>
Students that take all courses at the Mount Vernon Campus	78	<b>74</b>
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.	208	<b>207</b>
School Without Walls students	27	<b>28</b>
<b>Foggy Bottom student headcount</b>	18121	<b>17,129</b>

**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 2019 Foggy Bottom Student Full Time Equivalent (FTE) – 16,375

**Spring 2020 Foggy Bottom Student Full Time Equivalent (FTE) – 15,187**

**Notes:**

Note 1 - Data as of the GW census date, October 5, 2019.

**Note 2 - Data as of the GW census date, February 22, 2020.**

**Note 3** – Per updated C-4 language approved by Zoning Commission Order No. 06-11N, C-4, Corcoran students who reside in on-campus beds on the Foggy Bottom Campus shall each be counted toward the Foggy Bottom student headcount. Note that students taking all of their courses at the Corcoran are not specifically deducted from this number as they are not included in the “Foggy Bottom/Mount Vernon Campus Total Student Body” by virtue of their courses not being located on the Foggy Bottom or Mount Vernon campuses.

**ATTACHMENT B – Audit Report dated January 22, 2020 by McConnell & Jones, LLP**



**THE GEORGE WASHINGTON UNIVERSITY**  
FALL 2019 CENSUS DATA  
and  
INDEPENDENT ACCOUNTANT'S REPORT

# THE GEORGE WASHINGTON UNIVERSITY

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**Independent Accountant’s Report**

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

We have examined the Fall 2019 Census Data submitted by The George Washington University (GW) to the District of Columbia Office of the Zoning Administrator in December 2019. 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 and modified on May 4, 2015 (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. This report is intended solely for the information use of The George Washington University and the District of Columbia Office of the Zoning Administrator and is not intended to be and should not be used by anyone other than these specified parties.

January 22, 2020

**THE GEORGE WASHINGTON UNIVERSITY (GW) CENSUS DATA**  
**Determination of Foggy Bottom Total Student Body Head Count**  
**for Fall 2019**

Total GW Student Body Head Count	27,814
Less: Students not enrolled in courses at either the	
Foggy Bottom or Mount Vernon campuses and not in GW Housing	<u>7,943</u>
Foggy Bottom/ Mount Vernon Total Student Body Head Count	19,871
Add: Foggy Bottom resident undergraduate and graduate students that take zero credits on the Foggy Bottom Campus	23
Less: Study Abroad Students	479
Continuous Enrollment Students	362
Students residing at the Mount Vernon Campus	618
Students taking all courses at the Mount Vernon Campus	78
School Without Walls	28
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>208</u>
Foggy Bottom Total Student Body Head Count	<u><u>18,121</u></u>
Foggy Bottom Total Student Body Full-Time Equivalents	<u>16,375</u>

*See notes to census data and independent accountant's report.*

**THE GEORGE WASHINGTON UNIVERSITY**  
**NOTES TO CENSUS DATA**  
Fall 2019

**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.

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

*See independent accountant’s report*

**THE GEORGE WASHINGTON UNIVERSITY**  
**NOTES TO CENSUS DATA**  
 Fall 2019

**NOTE 2 ENROLLMENT METHODOLOGY (Continued)**

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.

*See independent accountant's report*

**THE GEORGE WASHINGTON UNIVERSITY**  
**NOTES TO CENSUS DATA**  
 Fall 2019

**NOTE 3      DEFINITIONS (Continued)**

Study Abroad	Students studying outside of the United States during the 2019 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.

*See independent accountant's report*

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

**Foggy Bottom Faculty and Staff Headcount**

	Fall 2019 <sup>1</sup>	Spring 2020 <sup>2</sup>
Summation of:		
Regular full-time faculty and staff	4,203	<b>4,269</b>
Regular part-time faculty and staff	217	<b>247</b>
Wage account staff that are not Foggy Bottom students accounted for pursuant to Condition C-4	640	<b>570</b>
Temporary part-time faculty (excluding part-time clinical faculty who are not paid employees of the University)	1,057	<b>1,246</b>
Affiliated faculty employed by the Medical Faculty Associates	383	<b>378</b>
Visiting instructional and research faculty	145	<b>141</b>
<b>Foggy Bottom Faculty and Staff Headcount</b>	6,645	<b>6,851</b>

**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 2019 Foggy Bottom Faculty and Staff Full-Time Equivalent (FTE) – 5,264

**Spring 2020 Foggy Bottom Faculty and Staff Full-Time Equivalent (FTE) – 5,366**

**Notes:**

Note 1 - Data as of the GW census date, October 5, 2019.

**Note 2 - Data as of the GW census date, February 22, 2020.**



**ATTACHMENT D – Methodology Supporting Undergraduate Student Housing Numbers**

**Determining Full-Time Foggy Bottom Undergraduate Students**

	Fall 2019 <sup>1</sup>	Spring 2020 <sup>2</sup>
Foggy Bottom/Mount Vernon Campus Total Student Body	19,871	<b>18,925</b>
Sum (plus):		
Foggy Bottom resident undergraduate students that take zero credits on Foggy Bottom Campus	5	<b>6</b>
Foggy Bottom resident graduate students that take zero credits on the Foggy Bottom Campus	18	<b>14</b>
Less (minus):		
Graduate students	6,583	<b>6,250</b>
First professionals (JDs, MDs)	2,279	<b>2,255</b>
Undergraduates taking fewer than 12 credits at the Foggy Bottom campus (and are not accounted for under the Mount Vernon Campus Plan Order, below)	469	<b>777</b>
Non-degree students	286	<b>228</b>
Full-time undergraduate study abroad students	467	<b>574</b>
Undergraduate continuous enrollment students	158	<b>104</b>
Full-time undergraduate students who reside on the Mount Vernon campus	599	<b>596</b>
<b>Full-Time Foggy Bottom Undergraduate Students</b>	9,053	<b>8,161</b>

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

	Fall 2019 <sup>1</sup>	Spring 2020 <sup>2</sup>
Summation of:		
Beds available to undergraduate students in GW owned or leased properties within the campus plan boundary	7,052	<b>7,052</b>
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	<b>21</b>
<b>Total Number of On-Campus Beds Available to Undergraduates</b>	7,073	<b>7,073</b>

**On-Campus Beds Occupied by Full-Time Foggy Bottom Undergraduate Students – 6,219**

*Based on housing programs records of residence hall occupancy as of census date (February 22, 2020)*

**Notes:**

Note 1 - Data as of the GW census date, October 5, 2019.

**Note 2 - Data as of the GW census date, February 22, 2020.**

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

FALL 2019 DATA <sup>1</sup> University supplied beds within Foggy Bottom/West End Area	Total Number of Beds Available (Fall 2019)	Available to Full-Time Foggy Bottom Undergraduates (Fall 2019)	Occupied by Full-time Foggy Bottom Undergraduates (Fall 2019)
The Aston, 1129 New Hampshire Avenue, NW 2144 F Street, NW Columbia Plaza, VA Avenue NW between 23 <sup>rd</sup> & 24 <sup>th</sup> Streets	248 4 5 units	0 0 0 units	0 0 0 students
<b>Totals</b>	<b>257</b>	<b>0</b>	<b>0</b>

SPRING 2020 DATA <sup>2</sup> University supplied beds within Foggy Bottom/West End Area	Total Number of Beds Available (Spring 2020)	Available to Full-Time Foggy Bottom Undergraduates (Spring 2020)	Occupied by Full-time Foggy Bottom Undergraduates (Spring 2020)
The Aston, 1129 New Hampshire Avenue, NW 2144 F Street, NW Columbia Plaza, VA Avenue NW between 23 <sup>rd</sup> & 24 <sup>th</sup> Streets	238 4 5 units	0 0 0 units	0 0 0 students
<b>Totals</b>	<b>247</b>	<b>0</b>	<b>0</b>

**Notes:**

Note 1 - Data as of the GW census date, October 5, 2019.

Note 2 - Data as of the GW census date, February 22, 2020.

**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 2019	Spring 2020
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