

The George Washington University
Trachtenberg School of Public Policy and Public Administration
PPPA 6062.10
Community Development Policy
Fall 2018 Syllabus
As of July 5, 2018

Time: 6:10 p.m. – 8:00 p.m., Mondays
Location: Phillips Hall (801 22nd St. NW), Room 415

Professor: Joseph Firschein
joseph.a.firschein@frb.gov
703-731-5992 (cell)
202-736-5531 (work)
Office hours by appointment

Course Description:

This course examines the policy and practice of community development, including how private sector developers and lenders work with nonprofits, foundations, and the public sector to promote sustainable affordable housing, economic development, and other community-based projects that meet both financial as well as social impact criteria. The course explores a range of community and economic development programs and policy issues, including those related to financing affordable housing, community facilities, and small businesses. The course also addresses emerging trends that are likely to affect community development policymakers and practitioners in the future, including transit-oriented development, comprehensive community initiatives, and new ways of raising capital for community development projects.

Although the course includes a discussion of public policy analysis and underwriting techniques used by public and private sector community development practitioners, no previous community development finance or public policy experience is required.

Course Prerequisites: None

Required Texts:

1) Schwartz, A. “Housing Policy in the United States.” Third Edition. 2014. ISBN: 10: 0-415-836506 (paperback). The text can be obtained at:

http://www.amazon.com/Housing-Policy-United-States-Schwartz/dp/0415836506/ref=dp_ob_image_bk

2) Harvard Business Publishing Coursepack. The coursepack includes the cases listed below:

- a) “The Big Easy, Not So Easy.” Case Study from Harvard Business School, Harvard University. February 13, 2008, Revised March 3, 2009.

- b) “Buying Property in a Hot Market: NYC Creates a Fund to Keep Affordable Housing Developers in Play.” Case Study from the Kennedy School of Government, Harvard University. 2009. Also included – video interview with Shaun Donovan.
- c) “Breaking Down Barriers, Rebuilding Walls: The Role of Community Development Loan Funds.” Darden Business Publishing, University of Virginia. August 2009.
- d) “Investing in Early Learning as Economic Development at the Minneapolis Federal Reserve Bank.” Case Study from Harvard Business School, Harvard University. September 14, 2009.

The coursepack is available from the following Harvard Business Publishing link. The link requires students to register with a username and password (if you don’t have a username, you can create one on the site the first time you register):

<https://hbsp.harvard.edu/import/540205>

For other required readings available for free via the web, see details below under each class. Note that in addition to the required class readings, in some cases there are a number of “additional optional readings.” These readings are for students seeking additional information on a particular topic.

Student Learning Outcomes:

As a result of completing this course, students will be able to:

1. Identify and understand the public policy issues associated with the key federal, state, and local government community and economic development programs, including grant and loan programs, tax credit programs, and regulations;
2. Understand the role that banks and other regulated financial institutions play in community development, explore their incentives, and analyze current policy issues associated with the Community Reinvestment Act (CRA);
3. Describe and analyze the role that Community Development Financial Institutions (CDFIs) play in community development, explain how CDFIs partner with traditional financial institutions, and identify current public policy issues associated with CDFIs and the U.S. Department of the Treasury’s CDFI Fund;
4. Understand the implications of the large volume of foreclosed and/or vacant properties for policymakers and practitioners and current policy issues associated with foreclosed and vacant properties;
5. Understand the role that the housing Government Sponsored Enterprises (GSEs) – Fannie Mae and Freddie Mac – currently play in community development and the implications of alternative policies on the future of the GSE; and
6. Understand and analyze strategies employed by high performing public and private sector community development organizations and describe some of the new approaches being pursued by these organizations.

Class Requirements and Grading:

Students are expected to complete the following requirements:

1. **Class Participation (15%):** Regular course attendance is required. The class participation grade will be based on students' informed participation in the class discussions of the assigned required readings and cases. In class, students may be called on to answer questions or summarize assigned articles and cases. In addition, there may be periodic unscheduled in-class writing assignments on the required readings and these assignments will be considered as part of the participation grade. Note: students will not be expected to read the "additional optional readings" listed on the syllabus. As noted above, those optional readings are for students seeking more information on a particular topic.
2. **Community Development Policy Memo (30%):** Students will write an individual analysis of a community development policy topic. Detailed instructions for the policy memo will be posted on Blackboard.
3. **Midterm Exam (30%):** The exam will focus on items specifically discussed in class and in the assigned readings for the class sessions prior to the exam date. Detailed information on the exam format will be provided prior to the exam.
4. **Final Group Presentation (25%):** Students will divide into small groups and collaborate on a PowerPoint presentation analyzing a completed community development project. Detailed instructions for the Final Group Presentation will be posted on Blackboard. Final Group Presentation teams must submit their proposed presentation topic (project name, project type, date of completion, and location) in advance. The presentations will take place in class.

Background on Instructor:

Joseph Firschein is Deputy Associate Director and Community Affairs Officer at the Federal Reserve Board of Governors. He leads the Board's community development and policy analysis teams that are responsible for analyzing emerging consumer and community development policies and practices in order to understand their implications for the economic and supervisory policies that are core to the central bank's functions. These teams provide members of the Board of Governors and other divisions with recommendations for policy considerations. They also promote economic growth and financial stability for low- and moderate-income communities and individuals through a range of activities, including convening stakeholders for discussions on issues, conducting applied research, and gathering information on financial conditions. Through these mechanisms, the staff helps inform Board Members and external policymakers on a number of issues including: potential opportunities to mitigate foreclosure impacts, increasing affordable housing, improving access to small business credit, and connecting low-income individuals to appropriate financial services and jobs.

Prior to joining the Federal Reserve Board, Joseph served as a Director in Fannie Mae's Housing and Community Development Division where he managed the business segment responsible for financing community development financial institutions and led the company's efforts to sell foreclosed single family homes to public entities and nonprofits. Prior to joining Fannie Mae, Joseph managed lending to community development

financial institutions at the U.S. Treasury Department Community Development Financial Institutions (CDFI) Fund and served as lead community development analyst at the U.S. Office of Management and Budget (OMB) Housing Branch. Joseph has served as a board member of several local nonprofit community development organizations and is an adjunct professor at Georgetown University and George Washington University, where he teaches courses on community development finance and policy. Joseph has an MBA in Finance from the University of Maryland, Robert H. Smith School of Business; a Masters in Public Policy from the University of California, Berkeley, Goldman School of Public Policy; and a B.A. in Psychology from Stanford University.

Class Schedule

(Note: Guest speakers are still being confirmed)

Date	Topic	Reading Assignment Homework
Aug. 27 Class 1	<u>Introduction and overview:</u> Review of course organization and assignments. What is community development (CD) and what are some of the key policy and management issues facing CD policymakers and practitioners? What are the important trends and cross-cutting themes in the CD field?	<p>1) Schwartz, A. Housing Policy in the United States (course text), pp. 1-10 (“Introduction”) and 17-62 (“Trends, Patterns, and Problems”).</p> <p>2) Bernanke, B. “Resilience and Rebuilding for Low-Income Communities: Research to Inform Policy and Practice.” April 12, 2013.</p> <p>3) Desmond, M. “How Homeownership Became the Engine of American Inequality.” The New York Times Magazine. May 9, 2017.</p> <p>Additional Optional Readings:</p> <p>1) Covert, B. “The Deep, Uniquely American Roots of Our Affordable Housing Crisis.” The Nation. June 2018.</p> <p>2) Create Jobs for USA – Alliance Schools/LIIF video.</p> <p>3) “The Other Housing Crisis: Rental Housing.” Federal Reserve Bank of San Francisco. Spring 2013.</p> <p>4) Kimura, D. “Worst-Case Housing Needs Increase.” Affordable Housing Finance. August 9, 2017.</p>
Sept. 3	No Class – Labor Day	
Sept. 10 Class 2	<u>Community Development Lending – Part 1:</u> What roles have financial institutions played in CD and what are their primary incentives, including mission, regulatory, financial, and public relations? What role does the Community Reinvestment Act (CRA) play in CD and what are	<p>1) Schwartz, A. Housing Policy in the United States (course text), pp. 362-367 (“Community Reinvestment Act”)</p> <p>2) Braunstein, S. “The Community Reinvestment Act.” Testimony Before the Committee on Financial Services. February 13, 2008.</p> <p>3) National Community Reinvestment Coalition (NCRC). Principles for CRA Regulatory Reform. May 21, 2018.</p>

	<p>some of the key CRA policy issues?</p>	<p>4) Bhutta, N. and Canner, G. “Did the CRA Cause the Mortgage Market Meltdown?” Community Dividend. March 1, 2009.</p> <p>Additional Optional Readings:</p> <p>1) Ludwig, E. Kamihachi, J, and Toh, L. “The Community Reinvestment Act: Past Successes and Future Opportunities.” Federal Reserve Bank of San Francisco. February 2009.</p> <p>2) Getter, D. “The Effectiveness of the Community Reinvestment Act.” Congressional Research Service. January 7, 2015.</p> <p>3) “Modernizing the CRA.” Woodstock Institute. July 2010.</p> <p>4) CRA video. San Francisco Fed. August 2015.</p> <p>5) Badger, E. “How Redlining’s Racist Effects Lasted for Decades.” NY Times. Aug. 24, 2017.</p>
<p>Sept. 17 Class 3</p>	<p><u>Community Development Lending – Part 2</u>: What is the role of CDFIs in CD finance efforts? What are the key challenges facing CDFIs and what are some of the important public policy issues facing the CDFI industry? What are the key terms used in affordable housing pro formas and how are pro formas used to evaluate affordable housing projects?</p>	<p>1) Bernanke, B. “Community Development Financial Institutions: Challenges and Opportunities.” June 17, 2009. Speech at the Global Financial Literacy Summit, Washington, DC.</p> <p>2) “Breaking Down Barriers, Rebuilding Walls: The Role of Community Development Loan Funds.” Harvard Business Publishing Coursepack. To purchase, use link under “required texts” section of syllabus.</p> <p>3) Carsey Institute, CDFI Industry Analysis Summary Report, Spring 2012.</p> <p>Additional Optional Readings:</p> <p>1) Review of affordable housing pro formas and basics of underwriting affordable housing projects (materials to be posted on Blackboard)</p>

		<p>2) “Community Development Financial Institutions in North Carolina: Creating Jobs and Community Economic Development.” The Support Center. November, 2012.</p> <p>3) “Revival: The Story of CDFIs in Detroit.” Opportunity Finance Network. 2015.</p> <p>4) Nowak, J. “CDFI Futures: An Industry At a Crossroads.” March 2016.</p>
Sept. 24 Class 4	<p><u>Public Housing, Privately Owned Rental Housing Built With Federal Subsidy, and Vouchers:</u> To what extent is public housing developed and financed in conjunction with private developers and specifically what is the role of the HOPE VI program in developing mixed-income housing? What are the other key federal programs that subsidize privately owned rental housing? How are housing vouchers used to support privately owned rental housing? What are the key policy issues and potential reforms associated with these programs?</p>	<p>1) Schwartz, A. Housing Policy in the United States (course text), pp. 163-198 (“Public Housing”).</p> <p>2) Schwartz, A. Housing Policy in the United States (course text), pp. 203-223 (“Privately Owned Rental Housing Built With Federal Subsidy” and pp. 227-261 (“Vouchers”).</p> <p>Additional Optional Readings:</p> <p>1) “Politics, Poverty, and Profit.” PBS/Frontline. May 9, 2017.</p> <p>2) Pendall, R. and Hendey, L. “A Brief Look at the Early Implementation of Choice Neighborhoods.” Urban Institute. October 2013.</p> <p>3) Policy Basics: Federal Rental Assistance. Center for Budget Policy and Priorities. May 3, 2017.</p> <p>4) Fischer, W. “Moving to Work Compromise Would Reduce Risk from Expanding Demonstration.” Center for Budget Policy and Priorities. June 25, 2013.</p> <p>5) “The Cost of Affordable Housing: Does it Pencil Out?” Urban Institute. 2016.</p>
Oct. 1 Class 5	<p><u>The Low Income Housing Tax Credit (LIHTC) Program:</u> What are the key policy and management</p>	<p>1) Schwartz, A. Housing Policy in the United States (course text), pp. 135-159 (“The Low-Income Housing Tax Credit”).</p>

	<p>issues raised by the LIHTC Program? Who are the key participants in this program?</p>	<p>2) “Low Income Housing Tax Credit Overview.” Novogradac and Co. April 1, 2010.</p> <p>3) Sullivan, L. and Anderson, M. “Affordable Housing Program Costs More, Shelters Fewer.” National Public Radio. May 9, 2017.</p> <p>4) Retsinas, N., Segel, A, and Creo, B. “The Big Easy, Not So Easy.” Harvard Business Publishing Coursepack. To purchase, use link under “required texts” section of syllabus.</p> <p>Additional Optional Readings:</p> <p>1) “Low-Income Housing Tax Credit Program.” July 2015. OCC Community Affairs Publication.</p> <p>2) “A Calling to Build Community: Low Income Housing Tax Credit.” Video. Colorado Housing and Finance Authority. June 2013.</p> <p>3) Frontline video: “Poverty, Politics, and Profit.” May 9, 2017.</p> <p>Instructions and team assignments will be discussed for Final Group Presentations (instructions will also be posted on Blackboard)</p>
Oct. 8	No class – Fall break	
Oct. 15 Class 6	<p><u>State and Local Housing Programs and the Nonprofit Sector</u>: What are the key state and local housing programs, including block grants, tax-exempt bond financing, housing trust funds, and inclusionary zoning?</p>	<p>1) Schwartz, A. Housing Policy in the United States (course text), pp. 265-301 (“State and Local Housing Policy and the Nonprofit Sector”).</p> <p>2) Rosenthal, L., “Innovations in Housing Policy: The Evolving Role of Local Government.” Federal Reserve Bank of San Francisco. September 2005. Pgs. 9-12.</p> <p>3) Theodos, B. et al. “Homeownership for a New Era: Baseline Report on the Cornerstone Homeownership Innovation Program.” April 2015. Pages 1-18, 24-55, and 87-91.</p>

		<p>Additional Optional Readings:</p> <ol style="list-style-type: none"> 1) “The Uncertain Future of TOPA.” Urban Turf Blog. April 2011. 2) “We Own This.” Documentary on TOPA. Latino Economic Development Corporation. April 25, 2011. 3) Zippel, C. “DC’s Housing Affordability Crisis in 7 Charts.” Greater Greater Washington Blog. April 30, 2015. 4) “What Is Inclusionary Housing?” Jubilee Housing. November 2013.
Oct. 22 Class 7	<p><u>Public Sector Economic and Commercial Development Programs:</u> What is the role of public sector programs like Tax Increment Financing (TIF) and the New Markets Tax Credit (NMTC) program in supporting for local economic and commercial development? What is the role of early learning in local economic development?</p>	<ol style="list-style-type: none"> 1) Briffault, R. “The Most Popular Tool: Tax Increment Financing and the Political Economy of Local Government.” University of Chicago Law Review pp. 65-74. 2) “Investing in Early Learning as Economic Development at the Minneapolis Federal Reserve Bank.” Harvard Business Publishing Coursepack. To purchase, use link under “required texts” section of syllabus. 3) Theodos, B. and Meixell, B. “Are Opportunity Zones in the Greater DC Area Targeted to Communities in Need of Investment?” Urban Institute. June 20, 2018. <p>Additional Optional Readings:</p> <ol style="list-style-type: none"> 1) Tankersley, J. “Tucked Into the Tax Bill, a Plan to Help Distressed America.” New York Times. January 29, 2018. 2) Office of Comptroller of the Currency. “New Markets Tax Credits: Unlocking Investment Potential.” June 2013. 3) Abravanel, M. et al. “New Markets Tax Credit (NMTC) Program Evaluation.” 2013. page V-XX.

		<p>4) “New Markets Tax Credit: The Credit Helps Fund a Variety of Projects in Low-Income Communities, but Could be Simplified.” GAO Report to Congress on NMTC Program. January 2010. Pgs. 3-8 and 15-22.</p> <p>5) McGraw, D. “Tax Increment Financing: A Bad Bargain for Taxpayers.” Reason Magazine. January 2006.</p> <p>6) Rolnick, S and Rolnick, A. “The Minnesota Model for Early Childhood Education.” February, 2017.</p>
Oct. 29 Class 8	<p><u>Community Development and Housing Finance</u>: What are the key features of the present housing finance system, including institutions such as the Federal Home Loan Bank system, the Federal Housing Administration, and the Government Sponsored Enterprises? How do these institutions interact with private real estate developers and lenders working in the CD field? What are the implication of housing finance reform on the CD activities of private sector developers and lenders?</p>	<p>1) Schwartz, A. Housing Policy in the United States (course text), pp. 69-112 (“Housing Finance”).</p> <p>2) Bernanke, B. “The Future of Mortgage Finance in the United States.” October 31, 2008. Speech at the UC Berkeley/UCLA Symposium: The Mortgage Meltdown, the Economy, and Public Policy, Berkeley, California.</p> <p>3) Levitin, A. and Ratcliffe, J. “Rethinking Duties to Serve in Housing Finance.” October 2013.</p> <p>4) Goldstein, M. “Fannie and Freddie’s Status Continues to Provoke Criticisms.” New York Times. Nov. 14 2016.</p> <p>Additional Optional Readings:</p> <p>1) FHFA Final Rule on Duty to Serve. December 2016.</p> <p>2) Parrot, J. et al. “A More Promising Road to GSE Reform.” March 2016.</p> <p>3) CBO Report: “Transitioning to Alternative Structures for Housing Finance.” December 2014.</p>

		<p>4) Sediman, E. and Zigas, B. “Making Sure the FHFA’s Duty to Serve Regulations Help Underserved Housing Markets.” Urban Institute. December 31, 2015.</p> <p>5) Stevens, D. “Why I Support Reforming the GSEs, Not Eliminating Them.” Mortgage Bankers Association. August 21, 2015.</p> <p>6) Powell, J. “The Case for Housing Finance Reform.” July 6, 2017.</p> <p>Community Development Policy Memo due by beginning of class.</p>
Nov. 5 Class 9	<p><u>Community Development Programs Involving Small Business Credit</u>: What are the key challenges associated with small business credit access? How is the small business credit landscape changing? What is the role that CDFIs and other mission-focused small business lenders are undertaking to adapt to those changes?</p>	<p>1) Mills, K. and McCarthy, B. “The State of Small Business Lending: Credit Access During the Recovery and How Technology May Change the Game.” Harvard Business School. Working Paper. July 22, 2014. Pages 1-44.</p> <p>2) Northrup et. al. “CDFIs and Online Business Lending: A Review of Recent Progress, Challenges, and Opportunities.” Carsey School of Public Policy. November 2016.</p> <p>3) Cowley, S. “Ever Wanted to Back a Start-Up? Indiegogo Opens the Door to Small Investors.” New York Times. November 2016.</p> <p>4) “Micro-lender Kiva Zip off To as Fast Start in Milwaukee.” February 2015</p> <p>Additional Optional Readings:</p> <p>1) “2017 Small Business Credit Survey.” New York Federal Reserve.</p> <p>2) Testimony on SBIC Program. July 2013.</p> <p>3) SBA Small Business Finance. Frequently Asked Questions. 2014.</p> <p>4) Brainard, L. “Community Banks, Small Business Credit, and Online Lending.”</p>

		<p>September 30, 2015.</p> <p>Final Group Presentation teams must submit proposed presentation topic (project name, project type, date of completion, and location) via e-mail by beginning of class</p>
Nov. 12 Class 10	<u>Midterm Exam</u>	No assigned readings
Nov. 19 Class 11	<p><u>Implications of Foreclosure and Vacant Properties for Community Development:</u> What policy efforts have been undertaken to mitigate foreclosure and what has been the success of these programs? What are the key public sector and bank programs that are designed to incentivize reinvestment in areas affected by foreclosure and how are these programs working?</p>	<p>1) Schwartz, A. Housing Policy in the United States (course text), pp. 411-437 (“The Foreclosure Crisis and Policy Response”).</p> <p>2) “Policy Considerations for Improving Ohio’s Housing Markets.” Federal Reserve Bank of Cleveland. May 22, 2013.</p> <p>3) Treuhaft S. et al. “When Investors Buy Up the Neighborhood: Preventing Investor Ownership From Causing Neighborhood Decline.” Federal Reserve Bank of San Francisco. Spring 2011.</p> <p>Additional Optional Readings:</p> <p>1) “Why is Ed DeMarco Blocking a Win-Win Housing Program?” August 1, 2012.</p> <p>2) Compass Point fact sheet on Eminent Domain. July 16, 2012.</p>
Nov. 26 Class 12	<p><u>Community Development Trends and Emerging Policy Issues:</u> What are some expert views on how the CD field will evolve for practitioners and policymakers? What are particular areas of opportunity, including comprehensive community initiatives, pay for success approaches, online lending, and new ways of raising capital?</p>	<p>1) Azemati, H., et al. “Social Impact Bonds: Lessons Learned So Far.” Federal Reserve Bank of San Francisco, Community Development Investment Review. Volume 9, Issue 1, 2013.</p> <p>2) Letsinger, E. and Kim, M. “The Story Behind the World’s First Environmental Impact Bond.” Living Cities Blog. December 2016.</p> <p>3) “Building Sustainable Communities: Integrated Services and Improved Financial Outcomes.” LISC. April 2015. http://www.lisc.org/docs/publications/041415_</p>

		<p>srankin_foc_report.pdf</p> <p>4) Varley, P. “Buying Property in a Hot Market: NYC Creates a Fund to Keep Affordable Housing Developers in Play.” Harvard Business Publishing Coursepack. To purchase, use link under “required texts” section of syllabus.</p> <p>5) Brainard, L. “The Opportunities and Challenges of Fintech.” Dec. 2, 2016.</p> <p>Additional Optional Readings:</p> <p>1) “McCarthy, B. “Regulation Could Be Blessing in Disguise for Online Lenders.” American Banker. August 4, 2015.</p> <p>2) U.S. Treasury Department White Paper on Market Place Lending. “Opportunities and Challenges in Online Marketplace Lending.” May 10, 2016.</p> <p>3) Center for Responsible Lending Press Release. “Consumer & Small Business Advocates Oppose OCC’s Plan to Offer Fintech Lending Charters.” December 2, 2016.</p> <p>4) MDRC Statement on the Vera Institute’s Study of the Adolescent Behavioral Learning Experience (ABLE) Program at Rikers Island. July 2015.</p> <p>5) Anderson, J. and Phillips, A. “What We Learned From the Nation’s First Social Impact Bond.” July 13, 2015.</p> <p>6) Baker, T. “Marketplace Lenders Are a Systemic Risk.” American Banker. August 17, 2015.</p> <p>7) Popper, N. “Success Metrics Questioned in School Program Funded by Goldman.” Nov. 3, 2015.</p> <p>8) Stid, D. “Pay for Success is not a Panacea.”</p>
--	--	---

		<p>SF Fed. Community Development Investment Review.</p> <p>9) Gandel, S. “Here’s How Citigroup Is Embracing the Fintech Revolution.” June 29, 2016. http://fortune.com/citigroup-fintech/</p>
Dec. 3 Class 13	<p><u>Residential Mobility, Assisted Mobility Programs, and Fair Housing:</u> Is residential mobility a complement or competitor to traditional community development? How does residential mobility occur “naturally”? Do programs encouraging mobility benefit low-income people, and if so, in what ways? Is housing discrimination still a problem? What is “Affirmatively Furthering Fair Housing”?</p>	<p>1) Chetty et al. “The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment.” National Bureau of Economic Research. September 22, 2015.</p> <p>2) Coulton, C. et al. 2012. “Residential Mobility and Neighborhood Change: Real Neighborhoods Under the Microscope.”</p> <p>3) Turner et al. “Housing Discrimination Against Racial and Ethnic Minorities 2012 Executive Summary.”</p> <p>4) Davis and Appelbaum. 2015. “Obama Unveils Stricter Rules Against Segregation in Housing.” New York Times. http://www.nytimes.com/2015/07/09/us/hud-issuing-new-rules-to-fight-segregation.html</p> <p>5) Editorial Board, New York Times. “Ben Carson vs. The Fair Housing Act.” May 13, 2018.</p> <p>Additional Optional Readings:</p> <p>1) Thrush, G. “Under Ben Carson, HUD Scales Back Fair Housing Enforcement.” New York Times, March 28, 2018.</p> <p>2) Editorial Board, New York Times. 2015. “The End of Federally Financed Ghettos.”</p>
Dec. 10 Class 14	<u>Final Group Presentations</u>	Completed Final Group Presentations to be presented in class

Policy Memo Grading Rubric:

- Content – 80%
 - Complexity, depth of the response, and demonstrated understanding of the subject
 - Clarity and accuracy when describing key concepts
 - Making conclusions and/or recommendations that are supported by the information in the memo and/or in other cited materials
- Quality of Writing – 20%
 - Following the page length and/or format requirements
 - Grammar and punctuation, spelling, and sentence structure
 - Organization and coherence of ideas
 - Supporting the case analysis with references that add value to the analysis and support the conclusions/recommendations

University Policies:

University Policy on Religious Holidays

1. Students should notify faculty during the first week of the semester of their intention to be absent from class on their day(s) of religious observance.
2. Faculty should extend to these students the courtesy of absence without penalty on such occasions, including permission to make up examinations.
3. Faculty who intend to observe a religious holiday should arrange at the beginning of the semester to reschedule missed classes or to make other provisions for their course-related activities.

Support for Students Outside the Classroom

1. **Disability Support Services (DSS):** Any student who may need an accommodation based on the potential impact of a disability should contact the Disability Support Services office at 202-994-8250 in the Rome Hall, Suite 102, to establish eligibility and to coordinate reasonable accommodations. For additional information please refer to: <http://disabilitysupport.gwu.edu/>
2. **Mental Health Services 202-994-5300** The University's Mental Health Services offers 24/7 assistance and referral to address students' personal, social, career, and study skills problems. Services for students include: crisis and emergency mental health consultations confidential assessment, counseling services (individual and small group), and referrals. counselingcenter.gwu.edu/

Academic Integrity Code

Academic dishonesty is defined as cheating of any kind, including misrepresenting one's own work, taking credit for the work of others without crediting them and without appropriate authorization, and the fabrication of information. For the remainder of the code, see: studentconduct.gwu.edu/code-academic-integrity

Out of Class Learning

Average minimum amount of independent, out-of- class, learning expected per week: In a 15 week semester, including exam week, students are expected to spend a minimum of 100 minutes of out-of- class work for every 50 minutes of direct instruction, for a minimum total of 2.5 hours a week.