

INSPECTION REPORT

INSPECTION OF SBA'S INITIAL DISASTER ASSISTANCE RESPONSE TO HURRICANE FLORENCE





EXECUTIVE SUMMARY

Report
No. 19-11

April 17,
2019

INSPECTION OF SBA'S INITIAL DISASTER ASSISTANCE RESPONSE TO HURRICANE FLORENCE

What OIG Reviewed

This report presents the results of our inspection of the Small Business Administration's (SBA's) initial disaster assistance response to Hurricane Florence, the first major hurricane of the 2018 Atlantic hurricane season. The hurricane began as a category 4 hurricane on September 10, 2018. Florence was downgraded to a category 1 hurricane on September 13 and remained a category 1 storm as it made landfall over Wrightsville Beach, North Carolina, on September 14, 2018.

Florence dumped massive amounts of rain throughout the Carolinas, causing catastrophic flooding. The hurricane weakened to a tropical storm near the South Carolina border; therefore, it did not cause as much damage in South Carolina as was initially anticipated. The President declared Hurricane Florence a major disaster for North Carolina and South Carolina on September 14 and September 21, 2018, respectively.

Our objective was to assess SBA's initial disaster assistance response to Hurricane Florence, including staffing adequacy, loan application volume, and timeliness of disaster loan approvals.

To answer our objective, we interviewed SBA Office of Disaster Assistance officials and reviewed applicable laws and regulations, SBA's standard operating procedures, including SOP 50 30 9, and other SBA operating policies and guidance. In addition, we conducted on-site visits in North Carolina at seven Disaster Recovery Centers and one Business Recovery Center (BRC). We also analyzed data to assess loan application volume and processing times.

What OIG Found

SBA responded effectively during its initial disaster assistance response for Hurricane Florence. Specifically, SBA provided adequate staffing and surpassed its goals for establishing a field presence, opening BRCs, and processing loan applications timely.

To establish its presence and assist disaster survivors, SBA used staff already onboard to assist Hurricane Maria survivors and rehired previously trained personnel used for Hurricanes Harvey and Irma.

As of the end of August 2018, SBA had approximately 1,877 staff onboard. To respond to Hurricane Florence and other disasters, SBA continued to increase its disaster assistance staffing up to 2,808 by the end of November 2018.

In response to Hurricane Florence, SBA surpassed its staffing goals of establishing field presence for both North Carolina and South Carolina. SBA provided staff for the Joint Field Office (JFO) in North Carolina on September 17, just 3 days after the disaster declaration, and in South Carolina on September 21, 2018, the same day as the disaster declaration. Additionally, SBA opened its first BRC in North Carolina on September 18, 2018, and South Carolina on September 25, 2018, which was within 4 days of each state's disaster declaration.

By the end of November 2018, SBA received 21,183 loan applications for Hurricane Florence. Of those, 17,791, or about 84 percent, were processed to a final decision; 2,743, or about 13 percent, were withdrawn; and 649, or about 3 percent, remained to be processed. SBA approved 9,206 of 17,791, or about 52 percent, totaling approximately \$368 million. Of those, 5,202 loans, or about 57 percent, were disbursed totaling approximately \$93.8 million.

Lastly, we computed SBA's processing times for Hurricane Florence disaster loan applications with a loan approval, denial, or withdrawal as of the end of October 2018 and found that SBA also exceeded their goals. The average processing time was approximately 7 days when computer-generated declines were not included. However, when these computer-generated declines were included, the overall average processing time was approximately 5 days.



**U.S. SMALL BUSINESS ADMINISTRATION
OFFICE OF INSPECTOR GENERAL
WASHINGTON, D.C. 20416**

Final Report Transmittal
Report Number: 19-11

DATE: April 17, 2019

TO: Chris Pilkerton
Acting Administrator and General Counsel

FROM: Hannibal "Mike" Ware 
Inspector General

SUBJECT: Inspection of SBA's Initial Disaster Assistance Response to Hurricane Florence

This report presents the results of our inspection of SBA's initial disaster assistance response to Hurricane Florence.

We appreciate the courtesies and cooperation extended to us during this inspection. If you have any questions, please contact me at (202) 205-6586 or Andrea Deadwyler, Assistant Inspector General for Audits, at (202) 205-6616.

cc: Pradeep Belur, Chief of Staff and Chief Operating Officer
James Rivera, Associate Administrator, Office of Disaster Assistance
LaNae Twite, Director, Office of Internal Controls

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Introduction

The Small Business Administration (SBA) plays a major role in disaster relief efforts in the wake of hurricanes, floods, earthquakes, and other physical disasters that occur in the United States and its territories. The mission of SBA's Office of Disaster Assistance (ODA) is to provide low interest disaster loans to individuals and businesses impacted by such disasters. Loans are offered to businesses of all sizes, private nonprofit organizations, homeowners, and renters to repair or replace real estate, personal property, machinery and equipment, inventory, and business assets that have been damaged or destroyed in a declared disaster. SBA also provides eligible small businesses and most private nonprofit organizations necessary working capital loans to help overcome economic injury resulting from a disaster.

Hurricane Florence, the first major hurricane of the 2018 Atlantic hurricane season, was a category 4 on September 10, 2018.¹ However, by the evening of September 13, Hurricane Florence was downgraded to a category 1 hurricane.² When it made landfall over Wrightsville Beach, North Carolina, on September 14, 2018, it remained a category 1 storm, dumping massive amounts of rain throughout the Carolinas, causing catastrophic flooding. The hurricane weakened to a tropical storm near the South Carolina border.

The President declared a major disaster due to Hurricane Florence for North Carolina and South Carolina on September 14 and September 21, 2018, respectively. The North Carolina deadline to file a disaster loan application for physical damages from Hurricane Florence was December 19, 2018. The deadline to file an economic injury disaster loan (EIDL) application is June 14, 2019. For South Carolina, the deadline to file a loan application for physical damages was December 5, 2019, and for EIDL, is June 21, 2019.

By the end of November 2018, SBA received 21,183 Hurricane Florence loan applications. Of those, 17,791, or about 84 percent, were processed to a final decision; 2,743, or about 13 percent, were withdrawn; and 649, or about 3 percent, remained to be processed. Of the 17,791 applications SBA processed to a final decision, it approved 9,206, or about 52 percent, totaling approximately \$368 million. Of those, 5,202 loans were disbursed, totaling approximately \$93.8 million.

Overview of Office of Disaster Assistance

ODA has five nonadministrative groups that perform specific functions to assist disaster survivors. These groups include two Field Operations Centers (FOCs), West and East; the Customer Service Center (CSC); the Processing and Disbursement Center (PDC); and the Damage Verification Center (DVC). SBA establishes Business Recovery Centers (BRCs) in areas affected by the disaster. The Federal Emergency Management Agency (FEMA) coordinates with state and local government agencies to establish Disaster Recovery Centers (DRCs) in the disaster-affected areas. The FOCs are responsible for assigning staff to the DRCs and the BRCs. There are two FOC locations: one in Sacramento, California, which services all disaster locations west of the Mississippi River, and one in Atlanta, Georgia, which services the geographic area east of the Mississippi.³

¹ According to the Saffir-Simpson Hurricane Wind Scale, a category 4 hurricane is characterized by wind speeds of 130–156 mph. This is considered a major hurricane because of the potential for significant loss of life and catastrophic damage.

² According to the Saffir-Simpson Hurricane Wind Scale, a category 1 hurricane is characterized by wind speeds of 74–95 mph. These very dangerous winds will likely produce some damage.

³ Minnesota is assigned to FOC East in Atlanta, Georgia.

FEMA automatically screens disaster survivors that register for grant assistance online at DisasterAssistance.gov to determine if they should be referred to the SBA disaster loan program. FEMA and the SBA implemented an interface to reduce data entry for disaster survivors. Applicants that apply electronically through DisasterAssistance.gov can use their FEMA registration information to pre-populate the SBA electronic loan application. For Presidential declarations like Hurricane Florence, SBA uses automated outreach (emails, phone calls, letters, or other methods) to contact individuals and businesses referred to SBA by FEMA. SBA informs the FEMA registrants that they were referred to SBA for disaster assistance. Disaster survivors can apply for a disaster loan online or in person at a local DRC or BRC in the disaster-affected area.

Disaster Loan Processing Overview

SBA staff members at the PDC in Fort Worth, Texas, evaluate applicants for eligibility, creditworthiness, and repayment ability. After all application requirements are met, the application is accepted by the PDC for further processing. Those who qualify are approved, and their loan closing documents are prepared at the PDC. In addition, all disaster loans are disbursed by the PDC following receipt of the borrower's signed closing documents.

Before a disaster loan can be approved at the PDC, SBA's DVC employees must verify the loss the applicant sustained as a result of the disaster. The DVC performs the initial desktop verification for all home loan applicants and for most business loans, excluding large complex businesses. The DVC also performs subsequent verification reviews.

Prior Work

SBA OIG 18-19, Inspection of SBA's Initial Disaster Assistance Response to Hurricane Maria (July 19, 2018). This report found that while still assisting Hurricane Irma disaster survivors, SBA provided staff for two BRCs and five DRCs in the U.S. Virgin Islands within 33 days after Maria made landfall. Regarding Puerto Rico, SBA established three BRCs within 13 to 26 days and provided staff for two DRCs established by FEMA 30 days after Maria made landfall. As of March 30, 2018, SBA staffed a total of 15 recovery centers in the U.S. Virgin Islands and 154 in Puerto Rico. Although SBA hired staff, it did not fully anticipate the unprecedented need for Spanish interpretation services in Puerto Rico. SBA needed additional Spanish translation services to assist the staff in meeting the needs of disaster survivors. As a result, some survivors experienced estimated wait times of over 45 minutes or dropped calls.

SBA OIG 18-16, Inspection of SBA's Initial Disaster Assistance Response to Hurricane Irma (April 26, 2018). This report found that SBA established a meaningful presence in the immediate aftermath of Hurricane Irma. Within 20 days after Hurricane Irma was declared a disaster, SBA provided 127 staff for 27 recovery centers. By the end of December 2017, SBA increased its staff to 4,703 and operated 134 centers. SBA management noted that although SBA was able to provide staffing to assist Hurricane Irma survivors, the Schedule-A hiring process made it difficult to rapidly hire employees. Despite the unprecedented volume of disaster loan applications and hiring challenges, SBA met its 45-day processing goal for the applications. We found that SBA management could better assess their personnel needs if they fully utilized available management staffing tools.

SBA OIG 18-10, Inspection of SBA's Initial Disaster Assistance Response to Hurricane Harvey (January 19, 2018). This report found that SBA's initial response to Hurricane Harvey was expeditious. By the end of October 2017, ODA had more than quadrupled its staff to 4,310 and operated 84 recovery centers. As of November 2, 2017, ODA had served 60,694 Hurricane Harvey

disaster survivors. Despite its quick response, due to the magnitude of the three successive hurricanes impacting the United States and its territories, SBA was unable to meet its goals for answering calls and responding to email messages and had a backlog of 21,571 loan applications waiting to be processed.

GAO 14-760, *Additional Steps Needed to Help Ensure More Timely Disaster Assistance* (September 29, 2014). This report found that SBA did not meet its 21-day processing time goal for Hurricane Sandy business loan or EIDL applications. SBA took an average of 45 days to process physical business loan applications and 38 days for EIDL applications. SBA stated that it was challenged by an unexpectedly high volume of loan applications received early in its response to the disaster, as well as by technological difficulties. The Government Accountability Office (GAO) recommended that SBA revise its disaster planning documents and take steps to implement previously authorized private sector disaster loan programs.

SBA OIG 14-14, *Improving Accuracy of Performance Reporting to Better Manage Disaster Loan Processing Time Expectations* (June 30, 2014). This OIG report found that SBA's reported performance did not accurately communicate to eligible applicants and oversight officials how long it took staff to process loan applications. The processing time performance standards were generally not attainable beyond certain application volume levels.

SBA OIG 13-10, *The Small Business Administration Did Not Effectively Assess Disaster Assistance Staffing Requirements, Availability, and Readiness* (January 25, 2013). This report found that if another disaster of a magnitude like the 2005 Gulf Hurricanes occurred, SBA could encounter challenges in meeting staffing needs to achieve its mission. During the Gulf Hurricanes, training and supervising a large influx of temporary staff proved very difficult for SBA.

Objective

Our objective was to assess SBA's initial disaster assistance response to Hurricane Florence, including staffing adequacy, loan application volume, and timeliness of disaster loan approvals.

Staffing Adequacy

Staffing Levels

The Small Business Act requires the SBA Administrator to ensure that the number of full-time equivalent employees in ODA is not less than 800 core permanent employees and that the disaster cadre is not less than 1,000.⁴ As of the end of August 2018, ODA had 1,877 staff onboard. By the end of September 2018, ODA increased its staffing to 2,304. ODA continued to increase staffing levels to 2,758 and 2,808 by the end of October and November 2018, respectively, to respond to Florence and other disasters.⁵ Table 1 shows the overall staffing levels at the ODA Functional Centers.

Table 1: ODA Staffing Levels – All Disasters

Functional Center Name	9/30/2018	10/31/2018	11/30/2018
PDC	1,293	1,334	1,317
DVC	224	419	370
CSC	184	205	170
FOC West	95	113	174
FOC East	508	687	777
Total Staff	2,304	2,758	2,808

Source: Information Provided by SBA Office of Disaster Personnel.

Hurricane Florence Disaster Recovery Centers, Business Recovery Centers, and Disaster Loan Outreach Centers

The services SBA offered at the DRCs, BRCs, and DLOC included the following:

- assistance with questions and completing disaster loan applications using SBA’s Disaster Loan Assistance Portal
- performing loan closings

SBA responded effectively during its initial disaster assistance response for Hurricane Florence. Specifically, SBA provided adequate staffing and surpassed its goals for establishing a field presence and opening BRCs. SBA also responded to numerous calls and emails and conducted damage loss verifications timely and surpassed its goal for loan application processing times.

To establish its presence and assist disaster survivors, SBA used staff already onboard to assist with Hurricane Maria and rehired previously trained personnel that assisted with Hurricanes Harvey and Irma. SBA was in the process of reducing staff from Hurricane Maria; however, due to the timing of Florence, SBA was able to retain and rehire some of this trained and experienced staff.

SBA provided staff for the Joint Field Offices (JFOs) in North Carolina and South Carolina on September 17 and September 21, 2018, respectively. The North Carolina JFO was opened 3 days after the disaster declaration, and the JFO in South Carolina was opened on the same day as the disaster declaration. SBA met its goal to establish field presence within 3 days of disaster declaration. Additionally, SBA opened its first BRCs in North Carolina on September 18 and in South Carolina on September 25, 2018, which was within 4 days of each state’s disaster declaration, and as a result, SBA met its goal to open the BRCs within 5 days of the disaster.

⁴ 15 USC 636(b)(7)(A).

⁵ Other disasters include Hurricanes Maria and Michael, and Wisconsin storms and flooding.

From September 14 to November 30, 2018, SBA provided staff for 27 DRCs, 12 BRCs, and 2 Disaster Loan Outreach Centers (DLOCs) in North Carolina to assist Hurricane Florence disaster survivors. As of the end of November 2018, 11 DRCs, 10 BRCs, and 1 DLOC were still operating in North Carolina. In South Carolina, SBA provided staff for 8 DRCs, 6 Mobile DRCs, and 6 BRCs from September 21 until November 30, 2018. The 6 BRCs were still operating at the end of November 2018; however, the DRCs and Mobile DRCs were closed.

SBA staff at DRCs and BRCs provided on-site assistance with disaster loan applications to disaster survivors. Although the BRCs are created specifically to help business owners with recovery, SBA does not turn away homeowners or renters who come to a BRC seeking a disaster assistance loan. SBA’s policy is to assist any eligible disaster survivor who enters a BRC or DRC. SBA staff can decline loan applicants at the DRCs and BRCs based on income tests and family size. This allows SBA to immediately refer disaster survivors that did not qualify for an SBA loan back to FEMA for possible additional grant assistance.

We conducted site inspections at seven of the DRCs and one BRC located in North Carolina (see appendix II) during the first week of October 2018. We began the inspections 17 days after Hurricane Florence made landfall in North Carolina. We observed that the disaster loan applicants were experiencing minimal wait times at the locations we visited.

Customer Service Center Staffing and Service Levels

The Customer Service Calling Center is usually a disaster survivor’s first point of contact with SBA after a disaster strikes. In addition to answering general questions and assisting individuals and businesses with applying for a loan, the CSC performs a myriad of other tasks that include the following:

- issuing paper disaster loan applications upon request
- verifying that documents submitted by an applicant are in the customer’s file
- reviewing the loan file to determine what additional information is needed
- making corrections to mailing addresses and phone numbers
- providing customers with the SBA loan status
- accepting loan payments by telephone
- performing outreach calls to FEMA registrants referred to SBA that have not applied for a disaster loan

Table 2 below indicates the call volume the CSC received during the week prior to Hurricane Florence, the week the disaster occurred, and 11 weeks following the disaster.

Table 2: Customer Service Center Staffing, Call Volume & Unanswered Call Rate

Number of Weeks After Florence	Week Ending Date	Number Days Per Week Center Open	Average Agents Available [†]	Calls Received	Calls Answered	Calls Not Answered	Percent Calls Not Answered
-1	9/8/2018	4	74	7,796	7,758	38	0.49%
0	*9/15/2018	5	78	8,076	8,019	57	0.71%
1	9/22/2018	7	74	12,184	12,107	77	0.63%
2	9/29/2018	7	85	15,102	14,496	106	0.70%
3	10/6/2018	7	82	14,021	13,934	87	0.62%
4	**10/13/2018	6	86	12,465	12,377	88	0.71%

Number of Weeks After Florence	Week Ending Date	Number Days Per Week Center Open	Average Agents Available†	Calls Received	Calls Answered	Calls Not Answered	Percent Calls Not Answered
5	10/20/2018	6	95	17,547	17,434	113	0.64%
6	10/27/2018	6	103	17,024	16,923	101	0.59%
7	11/3/2018	6	103	16,114	16,031	83	0.52%
8	11/10/2018	5	112	14,950	14,861	89	0.60%
9	11/17/2018	5	100	13,478	13,415	63	0.47%
10	11/24/2018	4	91	9,417	9,356	61	0.65%
11	12/1/2018	5	95	14,188	14,099	89	0.63%

Source: Information from Buffalo Customer Service Center Daily Activity Summaries.

*Hurricane Florence made landfall on Friday, September 14, 2018.

**Hurricane Michael made landfall on Wednesday, October 10, 2018.

†This indicates only those CSC employees available to answer calls and emails. The CSC also had executives, managers, team leads, program assistants, administrative and IT personnel, and training staff.

The CSC call volume increased immediately after landfall of Hurricanes Florence and Michael. As the table above indicates, the Call Center was able to answer most of the calls received. Unanswered phone calls were less than 1 percent each week. The Call Center's performance following Hurricane Florence was significantly improved compared with Hurricane Harvey the previous year, which showed between 15 and 37 percent of unanswered calls in the 9 weeks after the disaster. We noted a similar improvement in the Call Center's response to email inquiries.

Hurricane Florence Disaster Damage Loss Verification

SBA performs initial desktop damage loss verification for all home loan applicants and for most business loans, excluding those for large complex businesses. According to SBA, it performed a total of 35,797 desktop verifications between September 15 and November 30, 2018. Of these, 15,196 were Hurricane Florence desktop loss verifications, which represented approximately 42 percent of all desktop verifications performed during the period. As of November 30, 2018, there were 150, or less than 1 percent, Hurricane Florence desktop verifications remaining to be performed.

When loans are greater than \$25,000, according to policy, SBA is required to perform an on-site, post-desktop review. From September 1, 2018, to November 30, 2018, the DVC had 3,066 on-site field inspections to perform, 871 of which were for Hurricane Florence. These included 542 Hurricane Florence home inspections, 65 business inspections, and 264 post-desktop inspections. As of November 30, 2018, SBA had 2,524 field inspections remaining to perform. Of these, 1,311, or about 52 percent, were for Hurricane Florence.

As of September 30, 2018, SBA had 53 loss verifiers (LVs) to perform on-site field inspections; by the end of December SBA had nearly tripled its number of loss verifiers, ending the month with 132 LVs to perform on-site inspections for all disasters.

Loan Application Volume and Processing Timeliness

By the end of November 2018, SBA received 21,183 Hurricane Florence loan applications. Of those, 17,791, or about 84 percent, were processed to a final decision; 2,743, or about 13 percent, were withdrawn; and 649, or about 3 percent, remain to be processed. Of the 17,791 applications SBA processed to a final decision, it approved 9,206, or about 52 percent, totaling approximately \$368 million. Of those, 5,202 were disbursed totaling approximately \$93.8 million.

Most of the loans approved and the associated dollar amount were for North Carolina applicants. SBA completed processing for 15,728 Hurricane Florence applications and approved 8,185 loans totaling approximately \$324.4 million for North Carolina residents. Additionally, SBA completed 2,063 Hurricane Florence applications and approved 1,021 disaster loans totaling approximately \$43.6 million for South Carolina residents.

Table 3: Hurricane Florence Loan Application Volume, September 30, 2018–November 30, 2018

As of Date	Total Apps Received	Total Apps Completed	Total Apps Approved	Dollar Value of Loans Approved (Millions)	Dollar Value of Loans Disbursed (Millions)
09/30/2018	5,451	3,097	964	\$36.7	\$0.3
10/30/2018	17,045	13,596	6,742	\$274.5	\$41.9
11/30/2018	21,183	17,791	9,206	\$368.0	\$93.8

Source: Disaster Credit Management System Disaster Activity Reports.

Loan Processing Timeliness

We evaluated SBA’s processing times for Hurricane Florence disaster loan applications with a loan approval, denial, or withdrawal as of the end of October 2018. We calculated that the average processing time was approximately 7 days when computer-generated declines were not included. However, when these computer-generated declines were included, the overall average processing time was approximately 5 days.⁶ SBA surpassed its 31-day processing goal. We believe SBA’s ability to retain and rehire previously trained staff, combined with lower than expected loan application volume, contributed to its readiness and ability to meet and exceed its goals for Hurricane Florence.⁷ Table 4 shows the loan processing times for Hurricane Florence loan applications.

Table 4: Hurricane Florence Loan Processing Times, as of October 30, 2018

	All	Home	Business	EIDL*	Nonprofit
Total Number of Applications Processed	15,520	14,085	1,057	340	38
Loan processing with Auto Decline and Pre-LV Decline**	5	5	8	7	12
Average Processing Days					
Loan processing without Auto Decline and Pre-LV Decline	7	7	11	9	12
Average Processing Days					

⁶ The Disaster Credit Management System can make a decline decision based on business rules for initial auto-decline and pre-loss verification decline, which allows disaster survivors to access other sources of disaster assistance such as FEMA grants.

⁷ As of October 2018, the goal was to process 85 percent of applications within 31 days for the fiscal year.

Appendix I: Objective, Scope, and Methodology

This report presents the results of our inspection of SBA's initial disaster assistance response to Hurricane Florence. Our objective was to assess SBA's initial disaster assistance response to Hurricane Florence, including staffing adequacy, loan application volume, and timeliness of disaster loan approvals.

To answer our objective, we interviewed SBA Office of Disaster Assistance officials and reviewed applicable laws and regulations, SBA's standard operating procedures, including SOP 50 30 9, and other SBA operating policies and guidance. In addition, we conducted on-site visits in North Carolina at seven Disaster Recovery Centers and one Business Recovery Center. We reviewed computer-generated disaster activity reports from the Disaster Credit Management System to assess loan application volume and analyzed data extracts to determine loan application processing times. We assessed the reliability of the data by performing limited testing and relied on prior audit work. We believe the data is sufficiently reliable to support the report conclusions.

We conducted this performance-based inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Inspection and Evaluation. Those standards require that we plan and perform the inspection to obtain sufficient, appropriate evidence to provide a reasonable basis for our conclusions and observations based on our inspection objective. We believe the evidence obtained provided a reasonable basis for our conclusions and observations based on our inspection objective.

Appendix II: SBA North Carolina Disaster Recovery Centers

DRC- Bobby Andrews Recreation Center, Beaufort County, North Carolina



DRC - Don Williamson Chevrolet, Onslow County, North Carolina



North Carolina DRCs and BRCs Visited

- Beaufort County DRC, Washington
- Brunswick County DRC, Bolivia
- Carteret County BRC, Morehead City
- Carteret County DRC, Beaufort
- Cumberland DRC, Fayetteville
- New Hanover County DRC, Wilmington
- Onslow County, DRC Jacksonville
- Pamlico County DRC, Grantsboro