



BEYOND THE HOAX:

Why Campus Public Safety Must Conduct After-Action Reviews of Active Shooter Hoaxes



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The campus threat environment has shifted in ways that few public safety leaders could have imagined even a decade ago. False active shooter reports and “swatting” incidents, once rare and largely dismissed as isolated pranks, are now occurring with increasing frequency, sophistication, and coordination.¹ These incidents are designed to provoke fear, overwhelm systems, and force rapid decision-making with incomplete and often conflicting information.

For campus public safety leaders, the most consequential mistake following a hoax³ is concluding that “nothing really happened.” In fact, *everything* happened. Systems were activated, command decisions were made, and mutual aid relationships were tested. A hoax is not a non-event. It is a live-fire exercise conducted without consent. Institutions that treat hoaxes as operationally insignificant miss one of the most important opportunities available to strengthen readiness before an act of targeted violence occurs.

This article argues that after-action reviews (AARs) of hoaxes are no longer optional. They are a professional obligation. In a threat environment where hoaxes are increasing and often arrive in clusters, the ability to learn quickly and institutionalize those lessons may be as important as any single tactical capability.



“ A HOAX IS NOT A NON-EVENT. IT IS A LIVE-FIRE EXERCISE CONDUCTED WITHOUT CONSENT. ”

For colleges and universities, the impact is real: large-scale law enforcement responses, campus lockdowns, disrupted operations, frightened students and families, and heightened scrutiny from regulators and the public. The FBI has repeatedly warned that swatting incidents are not victimless; they deliberately provoke armed responses that place both responders and civilians at risk.²

[1] Federal Bureau of Investigation, *Swatting and False Active Shooter Reports Public Service Announcement*, Internet Crime Complaint Center (IC3) (2023); Josh Moody, *Swatting Calls Reporting Fake Threats Terrorize Colleges*, Inside Higher Ed (Apr. 19, 2023).

[2] Federal Bureau of Investigation. (2013, September 3). The crime of “swatting”: Fake 9-1-1 calls have real consequences. FBI. <https://www.fbi.gov/news/stories/the-crime-of-swatting-fake-9-1-1-calls-have-real-consequences>

[3] For purposes of this article, “hoax” refers to false reports of active shooters and related swatting incidents that prompt a law-enforcement or campus emergency response, regardless of whether the report is later determined to be fabricated or unfounded.

HOAXES ARE OPERATIONALLY REAL EVENTS

Active shooter hoaxes replicate the most dangerous features of responding to actual incidents of violence: ambiguity, time compression, incomplete or deceptive information, and intense pressure on leaders to act. They frequently occur during high-visibility moments, like orientation, commencement, and athletic events, when campuses are populated with visitors unfamiliar with emergency procedures and who are disoriented to their surroundings.

Operationally, hoaxes activate the same systems as other emergencies. Dispatch centers process urgent calls. Officers deploy at rapid speed, filled with adrenaline. Buildings lock down, if they can. Mutual aid agencies converge. Emergency notification systems are activated. Senior leaders convene, often remotely, to make decisions with significant legal, safety, and reputational implications. Beyond these immediate dangers, hoax incidents also produce lasting psychological harm,⁴ affecting officers tasked with responding, students and employees subjected to lockdowns, families and visitors on campus, and a broader public increasingly questioning the safety of educational environments.

The distinction between a hoax and an actual act of violence lies in outcomes, not process. From a systems perspective, the response demands are nearly identical. That is precisely why hoaxes are such powerful stress tests and why failing to analyze them rigorously is a missed opportunity.



SEQUENCING EFFECTS AND THE EARLY-CLUSTER DISADVANTAGE

One of the least examined dynamics in campus responses to hoax threats is when the incident occurs. Hoaxes that happen early in a cluster, before patterns are visible, produce different decision-making dynamics, communications, and outcomes than those that occur later, after a broader context has emerged.

In late August 2025, a cluster of false active-shooter reports struck universities across the United States.⁵ The earliest documented incident in this wave occurred at Doane University in Nebraska on August 19, 2025, where a false report of an armed suspect prompted a campus lockdown.⁶ In the days that followed, similar hoax threats were reported at multiple institutions, including Villanova University and the University of Tennessee at Chattanooga,⁷ with approximately ten additional campuses affected soon thereafter.

[4] Trace Staff. (2025). School shooting hoaxes and their lasting trauma. *The Trace*. <https://www.thetrace.org/newsletter/school-shooting-hoaxes-can-be-as-psychologically-damaging-as-surviving-a-shooting/>

[5] Whitford, E. (2025, August 26). Colleges face shooting hoaxes as fall classes start. *Inside Higher Ed*.
[6] False threat prompts lockdown at Doane University; authorities suspect swatting. (2025, August 19). *Nebraska TV*. <https://nebraskatv.com/news/local/false-threat-prompts-lockdown-at-doane-university-authorities-suspect-swatting>

[7] ABC News. (2025, August 27). School shooting hoaxes: Experts underscore the seriousness of these crimes, penalties at stake. <https://abcnews.com/US/school-shooting-hoaxes-experts-underscore-seriousness-crimes-penalties/story?id=124984392>

[8] Sottile, Z. (2025, August 26). A wave of active shooter hoaxes at universities brings panic and turmoil to the start of the school year. *CNN*. <https://www.cnn.com/2025/08/26/us/villanova-chattanooga-university-swatting-calls>



Villanova University, a Catholic university just outside Philadelphia, experienced a swatting incident during a first-year orientation religious Mass, at a time when broader situational awareness of a coordinated hoax pattern had not yet emerged.⁸ There was no established narrative of coordinated swatting activity, no accumulated peer intelligence, and no widely circulated law enforcement advisories signaling a broader campaign. From the campus perspective, the report appeared as a singular, high-risk incident during a crowded event, precisely the scenario for which maximum life-safety responses are designed.

Institutions that encounter hoax threats at this early stage face what might be called an early-cluster disadvantage. Leaders must make rapid decisions without knowing whether they are confronting a lone false report, a coordinated effort, or the leading edge of a trend. In that environment, defaulting to full operational activation is both rational and defensible. Early-sequence institutions often experience predictable friction: command structures are stress-tested in real time, decision-making groups expand as leaders seek shared understanding, Emergency Notifications compete with evolving information, and authority lines must be clarified under pressure.

By contrast, institutions that experience hoax threats later in a visible cluster often *appear* more disciplined. This is not necessarily because they are better prepared. Rather, they benefit from context. Patterns become visible through peer-to-peer communications, media reporting, and law enforcement bulletins. Leadership behavior shifts accordingly: emergency operations centers are activated with greater clarity, initial decision-making is often confined to a smaller policy group, and pre-approved communication templates are used to convey what is known without overstating certainty.⁹

Wake Forest University illustrates how institutions confront and adapt to swatting incidents over time. After navigating a swatting incident in 2023,¹⁰ the University relied on its Wake Alert system (i.e., its mass notification system used for Emergency Notifications) to communicate with the campus community using multiple channels, including text, email, and web-based messaging. As hoax threats later emerged across institutions nationally, campuses with prior exposure to similar incidents or exercises were better positioned to clarify communication roles, streamline decision-making, and reduce confusion during rapidly evolving events. The practical effect of that prior experience helps to decrease the likelihood that process challenges will later be misinterpreted as failures of technology.

Other campuses report similar learning curves. Following hoax incidents, the University of Arkansas area responders said they would “soon conduct a post-incident review” with campus and municipal responders to examine response timelines and coordination.¹¹ At the University of Tennessee at Chattanooga, a hoax prompted a surge response involving approximately 150 officers from multiple agencies, later driving reflection on convergence control and command clarity.¹² Across these cases, the pattern is consistent: that earlier incidents expose friction; later incidents benefit from precedent.

[8] Sottile, Z. (2025, August 26). A wave of active shooter hoaxes at universities brings panic and turmoil to the start of the school year. CNN. <https://www.cnn.com/2025/08/26/us/villanova-chattanooga-university-swatting-calls>

[9] Mileti, D. S., & Sorensen, J. H. (1990). Communication of emergency public warnings: A social science perspective and state-of-the-art assessment. Oak Ridge National Laboratory. (Conversely, once a cluster of hoax incidents has emerged, some institutions prematurely label subsequent reports as hoaxes, leading to delayed, degraded, or even absent response efforts. In the event of actual violence, such failures to act could have catastrophic consequences.)

[10] Wake Forest University. (2023, April). Swatting continues to plague college campuses. <https://inside.wfu.edu/2023/04/swatting-continues-to-plague-college-campuses/>

[11] Kellams, K. (2025, August 26). Shooter reported on University of Arkansas campus, officials say hoax likely. KUAF. <https://www.kuaf.com/show/ozarks-at-large/2025-08-25/shooter-reported-on-university-of-arkansas-campus-officials-say-hoax-likely>

[12] Rosenzweig-Ziff, D. (2025, August 27). ‘Swatting’ hoaxes on college campuses spark panic and an FBI probe. The Washington Post. <https://www.washingtonpost.com/nation/2025/08/27/swatting-hoaxes-us-colleges/>

The lesson for campus leaders is not to hope they will be “later in the sequence” next time. Instead, it is to create the advantages of being later by institutionalizing clear decision architecture, practiced command structures, and disciplined communication protocols in advance.



WHY AFTER-ACTION REVIEWS ARE ESSENTIAL FOR HOAX INCIDENTS

After-action reviews convert disruption into preparedness. They allow institutions to move beyond anecdote and emotion to evidence-based improvement. Importantly, AARs conducted in response to a hoax can often be more candid than reviews of incidents involving actual violence, precisely because there are no victims, crime scenes, or active prosecutions constraining discussion.

A meaningful hoax AAR should answer questions such as:

- How quickly did we recognize a credible threat?
- Who assumed incident command, and when?
- How effectively did we integrate mutual aid partners?
- Were Clery Act Emergency Notifications issued promptly and in compliance with federal expectations?
- Where did decision-making slow down and why?

Critically, AARs should be treated as leadership tools, not compliance paperwork. The International Association of Chiefs of Police has long emphasized that after-action reviews are fundamental to continuous improvement in complex incidents.¹³ That principle applies equally to hoaxes, which increasingly represent the most common “critical incidents” campuses will face.

CLERY ACT EMERGENCY NOTIFICATION COMPLIANCE: HOAXES ARE NOT AN EXCEPTION

From a regulatory perspective, hoax incidents squarely implicate the Emergency Notification requirements of the Jeanne Clery Campus Safety Act (“Clery Act”). The Clery Act requires institutions to issue an Emergency Notification upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees.¹⁴ These requirements are further supported by 34 C.F.R. § 668.46(g), which requires institutions to develop, disclose, and follow documented procedures for confirming emergencies, identifying responsible authorities, and initiating notification without delay.

Crucially, “confirmation” does not require certainty that a crime has occurred. Instead, it requires a reasonable determination, based on currently available information, that a significant emergency or dangerous condition may exist. In hoax scenarios involving reports of an active shooter, especially those with AI generated sounds of gunfire¹⁵ with no rapid way to deny that the incident could be real, that threshold is frequently met instantly, if not within minutes. Clery guidance consistently reinforces that institutions are not expected to wait for full verification, but rather to act upon credible information indicating a potential immediate threat.

[13] National Police Foundation. (2020). *How to conduct an after action review*. U.S. Department of Justice, Office of Community Oriented Policing Services. <https://www.policinginstitute.org/wp-content/uploads/2020/02/How-to-Conduct-an-AAR.pdf>

[14] While this article focuses on hoax active shooter incidents, Emergency Notification requirements under federal law apply broadly to any significant emergency or dangerous situation. Under the Jeanne Clery Campus Safety Act, institutions must issue an Emergency Notification upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees, including events that are not criminal in nature, such as severe weather, chemical spills, or hazardous materials incidents, to name a few. See U.S. Department of Education. (2016). *Handbook for campus safety and security reporting*.

[15] Sottile, Z. (2025, September 1). Swatter investigation into active shooter hoaxes at universities. CNN. <https://www.cnn.com/2025/09/01/us/swatter-investigation-active-shooter-hoaxes-universities>

After-action reviews consistently reveal that delays in emergency notifications are rarely caused by technology. They are caused by role confusion, diffused authority, and over-consultation at the precise moment Clery expects decisive action. Institutions wait to align stakeholders or reach consensus, unaware that each minute of delay increases regulatory risk. The Clery Act explicitly anticipates that Emergency Notifications will be initiated immediately upon confirmation, unless doing so would, in the professional judgment of responsible authorities, compromise efforts to assist victims or contain, respond to, or otherwise mitigate the emergency.¹⁶

Hoax AARs must therefore examine Clery compliance explicitly:

- When did the institution possess information indicating a potential immediate threat may have existed?
- Who had authority to issue an Emergency Notification upon confirmation of a significant emergency or dangerous condition (and is that authority consistent across internal policies, procedures, and external disclosures made in the Annual Security Report)?
- Was that authority clearly defined, trained, and exercised?
- How much time elapsed between confirmation (if you confirmed) and issuance of the notification?
- Did follow-up messaging appropriately distinguish between “active shooter” and “all-clear”?
Institutions must provide at least two messages in the Emergency Notification sequence: an initial alert notifying the campus community of the emergency, followed by at least one subsequent message indicating that the immediate threat has been resolved.
- Were Emergency Notifications disseminated through all available and appropriate communication channels, consistent with institutional procedures disclosed in the Annual Security Report?
- Did documented emergency response and evacuation procedures align with actual institutional practice during the incident under review?

Hoaxes are among the most likely incidents to expose Clery non-compliance because they are ambiguous, fast-moving, and emotionally charged. They also test whether institutional policies, procedures, training, and real-time decision-making are aligned, particularly as represented in the Annual Security Report and supporting policies and procedures. Treating them as “false alarms” rather than regulated emergencies invites scrutiny. Treating them as compliance-relevant incidents strengthens legal defensibility and campus safety alike.



WHY A HOAX DOES NOT SATISFY THE CLERY ACT'S EMERGENCY RESPONSE TESTING REQUIREMENT

Institutions occasionally assume that responding to a real-world hoax or swatting incident satisfies the Clery Act's requirement to test emergency response and evacuation procedures. It does not. While hoax incidents may provide valuable operational insight, they are not a substitute for the structured testing required under federal law. Under 34 C.F.R. § 668.46(g), emergency response and evacuation testing is a distinct and affirmative compliance obligation.

The Clery Act and its implementing regulations require institutions to test their emergency response and evacuation procedures at least once per calendar year. These tests must be scheduled, documented, and designed to evaluate the effectiveness of institutional preparedness, including coordination, communication, and response capabilities. Institutions must also publicize their emergency response and evacuation procedures in conjunction with at least one test annually and maintain documentation of the test, including a description of the exercise, the date, time, and whether it was announced or unannounced. The purpose of the testing requirement is not merely to observe how systems behave under stress, but to intentionally validate plans, roles, and procedures in a controlled and transparent manner.

[16] 34 CFR 668.46(g)(3)

Hoax incidents fail to meet these criteria for several reasons.

First, Clery testing must be planned and intentional. Emergency response tests are required to be scheduled exercises, meaning tabletop, functional, or full-scale, that are deliberately designed to evaluate specific components of an institution's emergency management framework. These exercises should align with the institution's documented emergency response and evacuation procedures as outlined within institutional policies and/or procedures and disclosed in the Annual Security Report (ASR), including defined roles, notification protocols, and response coordination expectations. Hoaxes, by definition, are unplanned and externally imposed. While they may activate systems, they do not reflect an institution's conscious effort to test or improve those systems as required by regulation.

Second, Clery testing must be documented as a test. Institutions are required to document the date, time, description, and whether the test was announced or unannounced. This documentation serves as part of the institution's administrative capability and must be retained to demonstrate compliance during a U.S. Department of Education (ED) program review. A real incident, particularly one involving law enforcement response, emergency notifications, and lockdowns, cannot be accurately or ethically recharacterized as a test after the fact. Attempting to do so exposes institutions to credibility and compliance risk during audits or program reviews.

Third, tests are designed to evaluate preparedness, not just performance under duress. Clery testing is intended to examine whether policies, training, authority structures, and communication protocols function as designed, and whether their design actually equips the institution to respond effectively to an emergency. Hoax incidents often distort this evaluation because decisions are shaped by fear, ambiguity, and incomplete information. While those dynamics are operationally real, they do not replace the value of testing known procedures against known objectives.

Finally, substituting hoaxes for required tests creates regulatory risk. During a Clery review, institutions that cannot produce evidence of a properly conducted annual test will be out of compliance. The U.S. Department of Education has consistently treated emergency response testing as a separate and affirmative obligation, not one that can be satisfied incidentally. Institutions are expected to demonstrate not only that a test occurred, but that it was conducted in accordance with disclosed procedures and supported by sufficient documentation to evidence compliance.



This distinction matters. Hoax incidents should be leveraged through after-action reviews to strengthen preparedness, clarify authority, and improve emergency notification decision-making. They also provide an opportunity to assess alignment between institutional practice and established Clery-aligned policies and procedures, particularly those outlined in the ASR. But they must not be mischaracterized as “compliance exercises”. Institutions that rely on real-world incidents to “check the box” on Clery testing risk failing both objectives: regulatory compliance and genuine readiness.

The most resilient campuses do both. They conduct deliberate, documented Clery-compliant tests *and* treat hoax incidents as serious learning events that inform future planning, training, and exercises. This dual approach supports both Federal compliance and the development of sustainable, defensible emergency management programs aligned with Clery Act expectations.

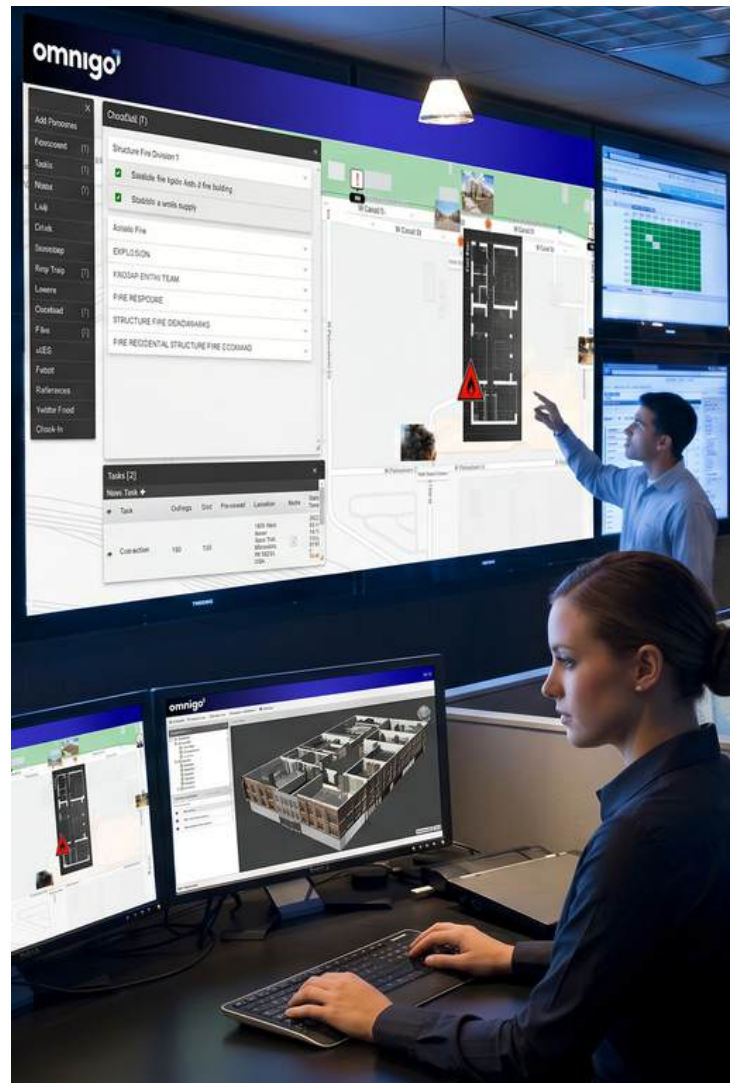
INTEGRATING CLERY ACT REQUIREMENTS INTO EMERGENCY PREPAREDNESS AND PLANNING

Effective Clery Act compliance is not achieved through isolated policy statements or post-incident documentation. It requires deliberate integration into an institution's broader emergency management and operational planning. Institutions that treat Clery as a reporting obligation, rather than an operational requirement, often encounter gaps between written procedures and real time decision making during critical incidents.

Emergency preparedness processes, including planning, training, exercises, and after-action reviews, should deliberately integrate Clery Act requirements into emergency operations. The elements of the Clery Act related to emergency response, evacuation, and emergency notification should not function as standalone compliance components but instead be embedded within planning and real time response. This integration should include the intentional involvement of the Clery Compliance Officer (CCO), or equivalent function, in emergency planning efforts, critical incident teams, and response decision making structures to ensure that regulatory considerations are addressed at the moment decisions are made.



Institutions should ensure that emergency operations plans, continuity efforts, and response protocols reflect the same roles, responsibilities, and processes disclosed in the ASR. Misalignment between documented procedures and actual practice is a common vulnerability identified during ED program reviews. Integrating Clery requirements into planning helps ensure that institutional actions during an emergency are both operationally effective and compliant.



Training and exercises provide a critical opportunity to reinforce this alignment. Clery related decision points should be incorporated into tabletop, functional, and full-scale exercises. This approach allows institutions to evaluate not only their emergency response capabilities, but also their ability to meet federal expectations under realistic conditions.

Institutions that successfully integrate Clery requirements into emergency preparedness efforts move beyond compliance as a discrete function. They establish a coordinated, repeatable approach in which policy, training, and operational execution are aligned. This approach not only reduces risk but also enhances the institution's overall ability to respond effectively to emergencies.

HOW TO CONDUCT A HOAX-FOCUSED AFTER-ACTION REVIEW

Effective AARs are structured, evidence-based, and action-oriented.

First, conduct a rapid “hotwash” (an immediate, informal debrief) within 24 to 72 hours with the core incident management team. Capture immediate observations while memories are fresh. Then, within several weeks, complete a formal AAR grounded in objective data collected during and following the incident: dispatch logs, CAD timelines, radio traffic, access control records, Emergency Notification logs, community feedback, and social media timelines.

Second, build the review around a master timeline rather than opinions. Anchor discussion to what actually happened and when. Timelines prevent hindsight bias and clarify where processes failed or succeeded.

Third, evaluate operations, policy, and communications as distinct but interconnected components. Many campuses struggle because these collapse into a single conversation during crises. Separating them analytically allows for clearer corrective actions.



Fourth, include mutual aid partners as equal participants. Hoaxes provide a rare opportunity to discuss unified command, staging, and interoperability without the constraints of an active crime scene.

Finally, ensure the AAR produces accountable results. A useful AAR includes a short executive summary, prioritized gaps, specific corrective actions, assigned owners, deadlines, and a plan for training and exercises to test improvements.



TURNING DISRUPTION INTO READINESS

Hoax incidents are not interruptions. They are unplanned evaluations of how an institution actually functions under pressure. They reveal whether authority is clear, whether communication holds under uncertainty, and whether systems perform the way leaders believe they will.

The risk is not the hoax itself. The risk is failing to learn from it.

Institutions that move past hoax incidents without disciplined review will encounter the same confusion, delays, and breakdowns the next time, regardless of whether actual violence ultimately occurs. Institutions that conduct rigorous after-action reviews will not eliminate uncertainty, but they will be better prepared to manage it.

For campus leaders, the question is no longer whether hoaxes matter. It is whether they will be used. They clarify how decisions are made, test whether authority holds, and strengthen systems before those systems are tested by real consequences.

Hoaxes are not anomalies. They are recurring stress tests. Institutions either learn from them or repeat the same failures.



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