

*The Chicago Tribune Co. v. The Board of Trustees of the University of Illinois* is the most recent iteration of a trend in which the Family Educational Rights Protection Act (“FERPA”) is interpreted by the federal circuit courts according to the plain language and original meaning of the text rather than the Congressional intent or other “softer” sources. Responding in part to United States Supreme Court decisions in *Gonzaga University v. Doe* and *Owasso Independent School District v. Falvo*, this interpretive trend can be found in all the federal circuit courts that have applied FERPA in the last twenty years. This article first summarizes and explains the current state of FERPA law, twenty years of federal circuit court case law, and the recent Seventh Circuit dismissal of *The Chicago Tribune* for lack of federal subject matter jurisdiction. The authors argue that if university administrators and state court judges can apply FERPA according to its plain language and original meaning, they will be able to accurately predict the outcomes of FERPA disputes and expect federal courts to reach concurrent conclusions.