

American Medical Association

Physicians dedicated to the health of America

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Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ATTN: Michael Marinelli

Supplement To
AOR 1994-12

Dear Mr. Marinelli:

This is in response to your questions regarding (1) the number of direct members of the American Medical Association ("AMA") who are members of a medical specialty society, and (2) whether, if the House of Delegates is the highest governing body of the AMA, such individuals would qualify as members of the AMA under the Commission's regulations by having the right to vote either directly for a specialty society delegate or for those who select the delegate.

As explained in more detail below, the AMA does not currently have the information necessary to provide a complete answer to these questions. The information we do have indicates that most direct members would not be able to qualify as AMA members through their role in the selection of a specialty society delegate.

1. Membership in specialty societies. At present, the AMA does not have current information regarding which physicians are members of most specialty societies.

Chapter 8.00 of the AMA Bylaws and current AMA policy require each specialty society to submit information reconfirming its qualification for Representation in the House of Delegates every five years. The information submitted includes information on the specialty society's membership for the prior year.

Most specialty societies submit membership information to the AMA only in connection with these periodic reviews. The AMA thus has no way of knowing whether a physician is a current member of the society at a particular time.

There are currently three specialty societies which provide membership information annually. This information is generally provided in January and lists members for the prior year. These reports do not provide information regarding which physicians are members of the society for the current year.

Three specialty societies -- the American Academy of Family Physicians, the American Society of Internal Medicine and the College of American Pathologists -- currently submit

membership information monthly. These are the only specialty societies for which the AMA can determine which physicians are currently members.

Because of the lack of current data, it is not possible to determine exactly how many direct members are also members of a specialty society. Based on the available information, it appears that approximately 50 percent of the direct members belong to a specialty society.

2. Selection of Specialty Society Delegates. The method by which each specialty society selects its delegate and alternate delegate is determined by the specialty society. To the best of my knowledge, all specialty society delegates are selected by an officer or by the directors or trustees of the societies. The AMA does not have information regarding how societies select their delegates, however, and it's possible that some delegates are elected by society members.

Whether a direct member of the AMA could satisfy the voting requirements of the regulations through membership in a specialty society depends on how the specialty society board or officer who selects the delegate is chosen. If the board or officer is elected directly by members of the society, direct members of the AMA who are members of the society would, assuming that the House of Delegates is the highest governing body of the AMA, satisfy the requirements. If the board is elected by an intermediate body, comparable to the AMA's House of Delegates, they would not satisfy the requirements.

I have reviewed the bylaws of a few specialty societies (the AMA does not have copies of the bylaws of all societies on file) and spoken with staff of some others. Among those for which I have information, the American Academy of Pediatrics (44,465 members in 1993), the American College of Ophthalmology (20,836 members), and the College of American Pathologists (13,840 members) have delegates who are selected by a board or officer elected directly by the members. The delegates for the American Academy of Family Physicians (72,000 members), the American College of Physicians (80,000 members), the American College of Radiology (28,500 members) the American College of Surgeons (60,000 members) and the American Society of Internal Medicine (26,000 members) are selected by a board or officer elected by an intermediate body.

A complete answer would require a survey of all the medical specialty societies in the House of Delegates. But it is clear from the information available that a significant portion of those direct members who are members of specialty societies do not have voting rights regarding the selection of the specialty society delegate which satisfy the requirements of the regulations.

I hope this answers your questions adequately. Please let me know if you need additional information.

Very truly yours,


Leslie J. Miller