From:	Brooke Schneider
To:	OCI Company Licensing
Subject:	Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc. and Wyssta Insurance Company, Inc
Date:	Wednesday, October 1, 2025 10:05:26 AM

Esteemed Office of the Commissioner of Insurance,

My team and I are writing to formally raise several concerns regarding the recent acquisition of Cherry Tree Dental by Delta Dental of Wisconsin Inc and the corporate restructuring involving said insurance company and Wyssta Insurance Company Inc, particularly as they pertain to regulatory oversight, consumer protection, provider accountability, and transparency obligations under the purview of your office.

This restructuring appears to involve significant changes in corporate control, operational structure, and potentially the delivery of dental services across multiple clinics in Wisconsin. The scope and scale of this transition have triggered substantial concern from patients, employees, and healthcare stakeholders. I respectfully urge your office to review and investigate the following areas:

1. Transparency and Public Disclosures

Despite the magnitude of this restructuring, there has been limited disclosure regarding the strategic intent, ownership changes, and operational implications. As this transition may impact insurance contracting, provider access, and consumer choice, it is imperative that the organizations involved fully comply with all reporting and transparency obligations under state insurance regulations.

Stakeholders—including patients—deserve clarity and specificity on how this restructuring affects their care, coverage, and provider networks.

2. Patient Access and Continuity of Care

The centralization and consolidation of services raise concerns about reduced access to local providers, delayed care, or termination of longstanding provider-patient relationships. If dental practices are being absorbed into larger corporate models, this may lead to prioritizing business efficiency over clinical necessity.

Disruptions to care—especially for underserved, Medicaid, or low-income patients—should be closely monitored to ensure they do not violate state healthcare access standards.

3. Due Diligence and Corporate Accountability

It is unclear what level of regulatory or fiduciary review was conducted prior to the finalization of this acquisition. A restructuring of this magnitude warrants careful examination to ensure compliance with state statutes governing insurance providers, managed care entities, and affiliated dental groups.

Specifically, any non-profit to for-profit structural shifts, ownership realignments, or third-party management arrangements should be reviewed to ensure they are not eroding public benefit obligations or circumventing regulatory oversight.

4. Staff Impact and Provider Autonomy

There are widespread reports of job insecurity, reduced clinical autonomy, and abrupt changes to employment terms among dental professionals affected by the restructuring. As providers are often central to the insurance delivery model, any degradation in workforce stability may impact access to covered care.

The Commissioner's Office should evaluate whether this restructuring may lead to changes in provider networks, credentialing procedures, or contract terminations that could affect consumer protections under dental insurance plans.

5. Risks of Reduced Oversight and Market Consolidation

Market consolidation in dental care and insurance—when not adequately regulated—can diminish consumer choice, reduce provider competition, and raise prices. It is critical that your office assess whether this acquisition presents risks of market dominance or vertical integration that might violate fair competition or consumer protection principles.

Conclusion

Given the potential implications of this restructuring on patient care, insurance regulation, provider access, and market stability, we urge your office to conduct a formal review of the Delta Dental / Cherry Tree transaction. At a minimum, this should include:

- Full disclosure of all ownership and control changes,
- Review of regulatory compliance and licensing,
- Assessment of impact on covered patients and network providers,
- And ongoing monitoring of service access, particularly for vulnerable populations.

Thank you for your attention to this matter and for your continued efforts to protect the integrity and accountability of our healthcare and insurance systems. Please feel free to contact me if further information would be helpful.

Sincerely,

The Concerned Team of Fogel Family Dentistry

Dr. Kathy Doyle-Kelly, D.D.S

Dr. Dylan Fogel, D.M.D