



September 6, 2025

Office of the Commissioner of Insurance  
101 E. Wilson St.  
Madison, WI 53703

To whom it may concern,

RE: Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc. and Wyssta Insurance Company, Inc

I am writing to formally express concern regarding a matter that I believe warrants the attention of your office. On July 1 of this year, Delta Dental of Wisconsin (DDWI) informed the dental community as a whole that it had purchased Cherry Tree Dental. This dental service organization has several offices which are primarily located in Wisconsin. In mid-July, DDWI filed papers with the Office of the Commissioner of Insurance outlining a proposed corporate restructuring that appears to be related to the transaction:

<https://oci.wi.gov/Pages/Companies/AcqDDWI.aspx>.

This development raises serious questions about conflicts of interest, market competition, and the long-term impact on patient care and provider autonomy. **And most importantly, raises an ethical question of whether we, as a state, want to support insurance corporations acting both as the payer and provider of dental services for our fellow citizens.**

As a practicing Wisconsin dentist, I am concerned that patients' treatment options may be driven more by what is cost-effective for the insurer and not by what is clinically best for their oral health. Patients may be incentivized or in some cases pressured into seeking care only within the DDWI network. I'm also concerned that independent dentists may be subjected to unfair competitive pressures, making it increasingly difficult for them to sustain their practices or even negotiate equitable terms with insurance companies. And when profit motives drive both the insurance coverage and the delivery of care, there is a risk that treatment decisions may be influenced more by cost containment than by clinical best practices.

I understand that the proposed restructuring at issue in this hearing, may be an attempt by DDWI to divest itself of ownership of the dental practice to try and alleviate the conflict of interest. However, since there is overlap between the board structure among various DDWI entities, I have serious doubts that such restructuring does anything to combat this conflict of interest. Not surprisingly, DDWI's proposed restructuring could also be seen as an admission by DDWI that it shares my belief that its ownership of a dental practice is a conflict of interest.

Diving deeper into this issue brings up an even more serious problem. Specifically, did DDWI purchase a dental practice, using assets that would otherwise be available for the benefit of its insureds, and is now requesting that such assets be transferred off its balance sheet through the proposed corporate restructuring? Seems like a lot of heavy legal lifting to make sure that this



business transaction goes through successfully. Also, If DDWI had excess reserves that were not needed to pay future claims, it is my belief that such reserves should have been used for the benefit of its insureds (either through reimbursement of premiums or reduction of future premiums). Instead, perhaps these reserves were used to purchase an asset (dental practices) and immediately transfer such assets out of DDWI. This transfer would make it so that these funds are no longer available for the benefit of their insureds.

I respectfully urge the Office of the Commissioner of Insurance to proactively investigate this matter further and consider whether current statutes adequately address the implications of vertical integration in the dental health sector. Oversight and transparency are essential to ensure that the interests of patients and independent dentists are protected.

Thank you for your attention to this matter. I truly believe that oral health plays an important role in the overall health of our community.

Sincerely,

Heather A. Harris, DDS

WDA Member

GMDA Board Member

Legislative Committee Member