

From: [Laura Goodell](#)
To: [OCI Company Licensing](#)
Subject: Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc. and Wyssta Insurance Company, Inc.
Date: Thursday, October 2, 2025 4:33:47 PM

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Dear Office of the Commissioner of Insurance,

I am writing to express our concerns regarding the recent acquisition of Cherry Tree Dental offices in Wisconsin by Delta Dental. This move raises significant issues that could impact patient care, provider independence, and the overall integrity of the dental care system in our state.

A primary concern is the conflict of interest that arises when a single corporate entity operates both as an insurer and as a dental care provider. When financial interests exist on both sides of the equation, there is a real risk that clinical decisions and referral patterns will be influenced by business priorities rather than what is in the best interest of patients. This can erode trust in the provider-patient relationship and place pressure on dentists to align with corporate objectives instead of making independent, patient-centered decisions.

We are also concerned about the potential reduction in patient choice. Vertical integration of this kind can result in patients being steered—intentionally or indirectly—toward affiliated practices through plan design, network limitations, or cost-sharing structures. This limits patients' ability to choose their own dental home and can, over time, squeeze out independent providers, reduce competition, and diminish access to care, especially in communities where options are already limited.

Furthermore, as insurers gain greater control over both the financing and delivery of dental care, we worry that treatment decisions will increasingly be guided by cost containment rather than clinical need. When business concerns begin to dictate what care is deemed necessary or appropriate, it compromises the professional judgment of providers and undermines the quality of care patients receive.

Given these concerns, we urge policymakers and regulators to carefully evaluate the broader implications of this acquisition. It is essential that safeguards be put in place to ensure that patient care remains the primary focus and that Wisconsin's dental care landscape remains competitive, transparent, and accessible.

Thank you for your attention to this important matter.

Sincerely

Laura Goodell DMD
Board Certified Pediatric Dentist

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