

To the Office of the Commissioner of Insurance (OCI):

My name is Richard Salm, DDS, FAGD, and I am a practicing dentist and Fellow of the Academy of General Dentistry. I am writing to submit my public comment in strong opposition to the proposed acquisition of private dental practices by Delta Dental of Wisconsin, Inc. and its affiliate, Wyssta Insurance Company, Inc.

As a clinician who has dedicated my career to serving the oral health needs of Wisconsin residents, I am deeply concerned that this acquisition poses a direct threat to the integrity of patient care, the autonomy of dental professionals, and the long-term health of our state's dental marketplace.

1. Conflict of Interest and Erosion of Patient-Centered Care

Allowing a dominant dental insurer to own and operate dental practices creates an inherent conflict of interest. The insurer's primary obligation is to its shareholders and financial performance, not to the clinical needs of patients. When the entity responsible for authorizing and reimbursing care also controls the delivery of that care, the risk is clear:

- **Treatment decisions may be influenced by cost containment, not clinical necessity.**
- **Patients may be steered toward in-network, insurer-owned clinics, regardless of their established relationships with independent providers.**
- **The trusted doctor-patient relationship is undermined, as patients may question whether recommendations are truly in their best interest or driven by corporate policy.**

The American Dental Association's Principles of Ethics and Code of Professional Conduct emphasize the dentist's duty to put patients first. Vertical integration of payers and providers blurs this line and threatens the foundation of patient advocacy.

2. Suppression of Competition and Reduction of Patient Choice

Delta Dental is already the largest dental benefits provider in Wisconsin, with significant market share. If allowed to acquire private practices, Delta Dental would gain the ability to:

- **Manipulate reimbursement rates** to favor its own clinics, squeezing out independent practices.
- **Design benefit plans** that incentivize or require patients to use Delta-owned providers, limiting access to unaffiliated dentists.
- **Accelerate market consolidation**, reducing the number of independent practices and, with it, the diversity of care models and patient options.

Historically, reduced competition in healthcare leads to higher costs, lower innovation, and diminished service quality. The Wisconsin Dental Association and the ADA have long advocated for a competitive landscape that empowers patients to choose their provider based on trust and quality, not insurance mandates.

3. Threats to Clinical Autonomy and Professional Ethics

Dentists employed by insurer-owned practices may face direct or indirect pressure to:

- **Adhere to treatment protocols designed to maximize profitability, not necessarily patient outcomes.**
- **Limit care to what is reimbursed, rather than what is clinically indicated.**
- **Meet productivity targets that may conflict with individualized, comprehensive care.**

This undermines the professional judgment and ethical obligations of dentists, eroding the standards that have made Wisconsin's dental community a model of excellence.

4. Data Privacy and Market Power Concerns

The aggregation of patient data from both the insurance and provider sides of the business raises serious privacy and antitrust concerns:

- **Delta Dental would possess an unprecedented trove of patient health, claims, and utilization data.**
- **Such data could be leveraged to target patients, influence referral patterns, and further entrench Delta's market dominance.**
- **Patients may not be fully aware of how their sensitive information is being used or shared within the vertically integrated entity.**

This concentration of data and market power is not in the public interest and may run afoul of both state and federal privacy and competition laws.

5. Impact on the Future of Independent Dentistry and Community Health

Independent dental practices are the backbone of Wisconsin's oral healthcare system. They:

- **Foster direct accountability to patients and communities.**
- **Support local economies and provide personalized care.**
- **Encourage innovation and responsiveness to patient needs.**

Allowing a single insurer to own a significant portion of the state's practices would:

- **Reduce the number of independent providers**, diminishing the diversity and resilience of our dental ecosystem.
- **Threaten the viability of rural and small-town practices**, where corporate models may not be sustainable or responsive to local needs.
- **Undermine the profession's ability to advocate for patients**, as more dentists become employees rather than independent practitioners.

6. Precedent and Regulatory Concerns

Other states have seen similar vertical integration efforts lead to:

- **Higher costs for patients and payers.**
- **Reduced access to care, especially in underserved areas.**
- **Legal challenges and regulatory interventions to restore competition.**

Wisconsin should learn from these experiences and act now to preserve a fair, competitive, and patient-centered dental marketplace.

7. Call to Action

For all these reasons, I urge the Office of the Commissioner of Insurance to reject the proposed acquisition of private practices by Delta Dental of Wisconsin, Inc. and Wyssta Insurance Company, Inc.

This is not merely a business transaction—it is a decision that will shape the future of oral health in our state for decades to come. The public interest demands that we maintain a clear separation between those who pay for care and those who provide it.

Thank you for your attention to this critical matter and for your commitment to protecting the health and well-being of Wisconsin's citizens.

Respectfully,

Richard Salm, DDS, FAGD
Fellow of the Academy of General Dentistry