



TESTIMONY OF WDA EXECUTIVE DIRECTOR MARK PAGET
OCI Hearing – Proposed Acquisition of Control of Delta Dental of Wisconsin, Inc.
and Wyssta Insurance Company, Inc.
Oct. 2, 2025

Good morning and thank you. My name is Mark Paget. I am executive director of the Wisconsin Dental Association, which represents more than 3,000 dentists who serve hundreds of thousands of Delta Dental-insured patients statewide.

We appreciate OCI's work in protecting consumers and maintaining a fair, transparent insurance market. And it's clear that Delta Dental has invested a lot of time, legal maneuvering and money creating its new structure, with promises of firewalls and safeguards to win approval.

That said, we remain deeply concerned about the **broader implications** of this arrangement. For the first time, dental practices in our state will be financially tied to a dental insurer – under the **same holding company** with **overlapping leadership**. This raises serious concerns about patient care, provider independence and the integrity of oral health care in Wisconsin. This is especially troubling given the harmful effects of vertical integration we've seen in medicine, pharmaceuticals and elsewhere.

Before I go on, it's important to emphasize that many Cherry Tree dentists are valued members of the WDA. They are skilled, dedicated professionals. Our issues lie with **broader, system-level challenges** that may limit their autonomy or compromise the patient-dentist relationship.

Specifically, our concerns include:

- Number one, **conflicts of interest**. When the same corporate entity has financial stakes in both the insurance side and the provider side, there's a real risk that clinical or referral decisions could be influenced by business priorities. This can erode patient trust and create pressure on providers to align with corporate goals rather than patient needs.
- Two, **reduced patient choice**. We're concerned that patients may be steered – through plan design, network restrictions or cost-sharing incentives – toward affiliated practices, limiting their ability to choose their own dental home. This kind of vertical integration can gradually squeeze out competition and reduce access to care.
- And three, **insurance companies influencing clinical care**. As insurers take greater control over both the financing and delivery of care, we worry that treatment will be based on cutting costs, not what's best for patients. That hurts the patient-dentist relationship and shifts focus away from a patient's real medical needs.

For these reasons, the WDA respectfully urges OCI to:

- First, **continue monitoring this structure closely**, not just based on the org chart, but also on how it operates day to day. Ownership may be indirect, but influence can still be very real.
- Second, **ensure transparency for patients**, so they fully understand who owns the dental practices they visit and how those relationships might affect their care options or coverage.
- And finally, **protect patient access and provider choice**, by safeguarding fair competition and preventing insurance plans from unfairly favoring affiliated practices.

We share OCI's commitment to an oral health care system and insurance industry where decisions are made in the best interest of the patient, not the bottom line.

Thank you for your time and for your continued oversight on behalf of the people of Wisconsin.