



August 17, 2026

Delta Dental of California and Affiliate Members
c/o Mr. Jeff Album and Dr. Dan Croley
P.O. Box 997330
Sacramento, CA 95899

To Whom It May Concern:

On behalf of the approximately 4,700 members of the Pennsylvania Dental Association (PDA), I am writing in strong opposition to Delta Dental's proposed weekly \$15 administrative fee to process paper checks for dentists who choose this payment method for dental claim reimbursement. We ask that you revoke this check fee policy immediately.

PDA believes that this exorbitant fee for processing paper checks is intended to force dentists into accepting electronic funds transfer (EFT) or virtual card payments. This undermines the Pennsylvania General Assembly's intent when it passed Act 58 of 2024: to ensure that dentists have the freedom to choose their preferred method of payment and to receive the full value of reimbursement for services rendered without unnecessary or unreasonable administrative fees or payment processing charges. Delta's policy effectively requires dentists to pay significantly more than they have been regardless of the payment option they choose.

Most dental practices operate as small businesses; as such, they are significantly impacted by increases in administrative costs and demands on staff time. Many dentists choose to accept paper checks for payment because it simplifies the audit trail and reduces complications with payment reconciliation. Reconciling batch explanation of benefits documentation is time-consuming and costly. They also might not be in the financial or administrative position to transition to an EFT or virtual credit card payment system. Forcing them to do so by assessing onerous fees for processing paper checks impacts the viability of dental practices and their ability to provide timely care and accept new patients, for example.

PDA is particularly concerned about Delta Dental's policy in light of the Commonwealth's dental workforce challenges. We are currently experiencing a negative net migration of dentists moving from the Commonwealth to practice in other states. Recent dental graduates, even those who attended schools in the Commonwealth, are largely choosing other states. PDA has long advocated

for common sense dental insurance reforms that will make the Commonwealth a more attractive state in which to practice dentistry, and we are thwarted at every turn. There is little incentive for dentists to practice in a state in which dental insurers are charging excessive fees for claims payment, in addition to contending with all of the other egregious policies and practices that are overly burdensome to dentistry: delays with credentialing, lack of prior notification and ability for dentists to opt out of leased networks, and opposition to dental loss reporting requirements are just a few. Rescinding the administrative fee for paper checks will illustrate a good faith effort from Delta Dental to work *with* providers who strive to provide quality and timely dental care to patients.

Thank you for your consideration. Please contact me at (412) 551-5498 or DrJamesMancini@aol.com, if you have any questions or would like to further discuss this issue. Or you may contact Marisa Swarney, PDA's director of government relations, at (717) 234-5941 x116, or mss@padental.org.

Sincerely,

A handwritten signature in black ink, appearing to read "James Mancini DMD". The signature is fluid and cursive, with the letters "J", "M", and "D" being particularly prominent.

James Mancini, DMD
President

cc: Michael Humpreys, Commissioner, Pennsylvania Insurance Department
The Honorable Greg Scott, PA House of Representatives
The Honorable Chris Gebhard, Chair, Senate Banking and Insurance Committee
The Honorable Perry Warren, Chair, House Insurance Committee