



MONTGOMERY COUNTY COUNCIL  
ROCKVILLE, MARYLAND

DAWN LUEDTKE  
COUNCILMEMBER  
DISTRICT 7

February 10, 2026

The Honorable Pamela Beidle  
Chair, Finance Committee  
3 East Miller Senate Office Building  
Annapolis, MD 21401

RE: Senate Bill 370, *State Acupuncture Board – Revisions*

Dear Chair Beidle,

Thank you for the opportunity to provide testimony in support of Senate Bill 370.

I urge your favorable consideration of this bill because it represents an important reform to Maryland's occupational licensing framework that will close a longstanding regulatory loophole and protect our communities from exploitation and illicit activity.

The revisions proposed in SB 370 to the State Acupuncture Board's authority and definitions, including clarifying the scope of manual therapies and strengthening licensure requirements, will close ambiguities that have allowed unregulated practitioners to operate outside meaningful oversight. These ambiguities have created a regulatory gap, particularly in areas of practice that overlap with "bodyworks" and similar services, which in turn has hampered the ability of local jurisdictions to effectively license, monitor, and, where necessary, enforce against establishments operating on the margins of state law.

Anti-human-trafficking organizations emphasize how looser licensing and regulatory structures are exploited by bad actors to conceal illicit businesses or to create environments where employees are vulnerable to coercion and abuse. Where licensing standards are unclear or inconsistent across professions, it becomes easier for operators to evade scrutiny, and significantly harder for local regulators – including health departments, code enforcement, and law enforcement partners – to differentiate lawful health-oriented services from those that mask illegal activity.

By strengthening the State Acupuncture Board's definitions and enforcement tools, SB 370 helps close that loophole. This supports local jurisdictions' ability to:


1. More effectively monitor practitioners and ensure that only qualified individuals provide therapeutic services;
2. Support local licensure regimes that are calibrated to community health needs while preventing illicit establishments from using gaps in state licensing as shelters from oversight;
3. Disrupt environments that can facilitate exploitation, including human trafficking, by increasing transparency about who is licensed, what services they are authorized to perform, and under what standards; and
4. Empower local regulators to act confidently and decisively when unlicensed or unauthorized practices are identified.

This bill aligns with the recommendations of advocacy groups and human-trafficking task forces that call for tight, clear, and enforceable regulatory systems as a cornerstone of community safety. Closing licensing gaps is not simply a technical adjustment; it is a substantive step toward ensuring that regulatory frameworks do not inadvertently provide cover for those who would harm residents or exploit vulnerable workers.

For these reasons, I respectfully urge the Committee's favorable report on Senate Bill 370.

Thank you for the opportunity to provide testimony.

Very truly yours,

A handwritten signature in black ink, appearing to read "Dawn Luedtke", written in a cursive style.

Dawn Luedtke  
Montgomery County Councilmember, District 7