

ACCOLADE, INC.  
1201 Third Avenue, Suite 1700  
Seattle, WA 98101

June 26, 2020

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
Office of Information Technologies and Services  
100 F Street, N.E.  
Washington, D.C. 20549

Attention: Dieterich King  
Eric Envall  
Doug Jones  
Keira Nakada

**RE: Accolade, Inc.**  
**Registration Statement on Form S-1**  
**File No. 333-236786**

Ladies and Gentlemen:

Accolade, Inc. (the "**Registrant**") hereby requests that the Securities and Exchange Commission (the "**Commission**") take appropriate action to cause the above-referenced Registration Statement on Form S-1 to become effective on Tuesday, June 30, 2020, at 4:00 p.m., Eastern Time, or as soon thereafter as is practicable or at such later time as the Registrant may orally request via telephone call to the staff of the Commission. The Registrant hereby authorizes each of Alan Hambelton and John Robertson of Cooley LLP, counsel to the Registrant, to make such request on its behalf.

Once the Registration Statement has been declared effective, please orally confirm that event with Alan Hambelton of Cooley LLP, counsel to the Registrant, at (206) 452-8756, or in his absence, John Robertson at (206) 452-8763.

**[SIGNATURE PAGE FOLLOWS]**

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Very truly yours,

**ACCOLADE, INC.**

By: /s/ Rajeev Singh

Name: Rajeev Singh

Title: Chief Executive Officer

cc: Stephen Barnes, *Accolade, Inc.*  
Richard Eskew, *Accolade, Inc.*  
Alan Hamblen, *Cooley LLP*  
John W. Robertson, *Cooley LLP*  
Christopher J. Austin, *Paul Hastings LLP*  
James M. Shea, Jr., *Paul Hastings LLP*

[COMPANY SIGNATURE PAGE TO ACCELERATION REQUEST]

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