

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

April 1, 2021

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

Attention: Scott Anderegg

**RE: Accolade, Inc.  
Registration Statement on Form S-1  
File No. 333-254291**

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 Monday, April 5, 2021, 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 D. Hambelton and John W. 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 D. Hambelton of Cooley LLP, counsel to the Registrant, at (206) 452-8756, or in his absence, John W. 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 D. Hambelton, *Cooley LLP*  
John W. Robertson, *Cooley LLP*

[COMPANY SIGNATURE PAGE TO ACCELERATION REQUEST]

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