

March 23, 2021

Rajeev Singh  
Chief Executive Officer  
Accolade, Inc.  
1201 Third Avenue, Suite 1700  
Seattle, WA 98101

Re: Accolade, Inc.  
Registration

Statement on Form S-1

Filed March 15,

2021

File No. 333-254291

Dear Mr. Singh:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Scott

Anderegg at 202-551-3342 with any questions.

Sincerely,

Division of Corporation Finance

Office of Trade & Services