



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

June 2, 2020

Teresa A. Herbert  
Chief Financial Officer  
INDEPENDENCE HOLDING CO  
96 Cummings Point Road  
Stamford, CT 06902

**Re: INDEPENDENCE HOLDING CO**  
**Form 10-K for the Fiscal Year Ended December 31, 2019**  
**Filed March 16, 2020**  
**File No. 001-32244**

Dear Ms. Herbert:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance  
Office of Finance