



DIVISION OF  
CORPORATION FINANCE

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

July 2, 2020

Adam Holland  
Chief Financial Officer  
TIVITY HEALTH, INC.  
701 Cool Springs Blvd  
Franklin, TN. 37067

**Re: TIVITY HEALTH, INC.**  
**Form 10-K for the year ended December 31, 2019**  
**Filed on February 27, 2020**  
**File No. 0000704415**

Dear Mr. Holland:

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 Life Sciences