

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

DIVISION OF CORPORATION FINANCE

February 27, 2024

Stephen Barnes Chief Financial Officer Accolade, Inc. 1201 Third Avenue Suite 1700 Seattle, WA 98101

Re: Accolade, Inc. Form 10-K for Fiscal Year Ended February 28, 2023 File No. 001-39348

Dear Stephen Barnes:

We have completed our review of your filings. 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 Trade & Services