

July 15, 2022

Dane C. Andreeff  
Chief Executive Officer  
HELIUS MEDICAL TECHNOLOGIES, INC.  
642 Newtown Yardley Road, Suite 100  
Newtown, PA 18940

TECHNOLOGIES, INC.

Statement on Form S-1

Re: HELIUS MEDICAL

Registration

Filed July 13, 2022

File No. 333-266107

Dear Mr. Andreeff:

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 Christine Westbrook at 202-551-5019 with any questions.

Sincerely,

Division of Corporation Finance

Office of Life Sciences

cc:

Emily Johns, Esq.