Helius Medical Technologies, Inc.

642 Newtown Yardley Road, Suite 100 Newtown, PA 18940

February 4, 2020 VIA EDGAR

United States Securities and Exchange Commission Division of Corporation Finance 100 F Street, N.E. Washington, D.C. 20549 Attn: Chris Edwards

RE: Helius Medical Technologies, Inc. Registration Statement on Form S-3

File No. 333-236101
Acceleration Request

Requested Date: February 6, 2020 Requested Time: 4:00 P.M. Eastern Time

Ladies and Gentlemen:

In accordance with Rule 461 under the Securities Act of 1933, as amended, the undersigned registrant (the "*Registrant*") hereby requests that the Securities and Exchange Commission take appropriate action to cause the above-referenced Registration Statement on Form S-3 (the "*Registration Statement*") to become effective on February 6, 2020, at 4:00 p.m., Eastern Time, or as soon thereafter as is practicable.

Once the Registration Statement has been declared effective, please orally confirm that event with Owen Williams, counsel to the Registrant, at (202) 842-7843.

Very truly yours,

Helius Medical Technologies, Inc.

/s/ Joyce LaViscount

Joyce LaViscount Chief Financial Officer and Chief Operating Officer

cc: Philippe Deschamps, President and Chief Executive Officer Darren K. DeStefano, Cooley LLP Jeffrey Libson, Cooley LLP