

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

DIVISION OF CORPORATION FINANCE

September 20, 2022

Kevin Detz Chief Financial Officer Sonida Senior Living, Inc. 16301 Quorum Drive, Suite 160A Addison, TX 75001

> Re: Sonida Senior Living, Inc. Form 10-K for the Fiscal Year Ended December 31, 2021 Filed April 15, 2022 File No. 001-13445

Dear Mr. Detz:

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 Life Sciences