

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

October 21, 2019

Paul DiPerna Chief Executive Officer Modular Medical, Inc. 800 West Valley Parkway, Suite 203 Escondido, CA 92025

> Re: Modular Medical, Inc. Form 10-K for the Fiscal Year Ended March 31, 2019

Filed June 27, 2019 File No. 000-49671

Dear Mr. DiPerna:

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

cc: Lawrence G. Nusbaum, Esq.