



DIVISION OF
CORPORATION FINANCE

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

May 26, 2020

Bruce K. Lee
Chief Executive Officer
Heartland Financial USA, Inc.
1398 Central Avenue
Dubuque, Iowa 52001

Re: Heartland Financial USA, Inc.
Registration Statement on Form S-4
Filed May 18, 2020
File No. 333-238459

Dear Mr. Lee:

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 Donald Field at 202-551-3680 with any questions.

Sincerely,

Division of Corporation Finance
Office of Finance