June 4, 2020

Daniel E. Bachus Chief Financial Officer Grand Canyon Education, Inc. 2600 W. Camelback Road Phoenix, Arizona 85017

Education, Inc.

Fiscal Year Ended December 31, 2019

2020

Interim Period Ended March 31, 2020

Re: Grand Canyon

Form 10-K for the

Filed February 20,

Form 10-Q for the

Filed May 7, 2020 File No. 001-34211

Dear Mr. Bachus:

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 Trade & Services