



DIVISION OF  
CORPORATION FINANCE

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

November 19, 2014

Via E-mail

Mr. Daniel E. Bachus  
Chief Financial Officer  
Grand Canyon Education, Inc.  
3300 W. Camelback Road  
Phoenix, AZ 85017

**Re: Grand Canyon Education, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2013**  
**File No. 001-34211**  
**Filed February 20, 2014**

Dear Mr. Bachus:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Terry French for

Larry Spigel  
Assistant Director