



DIVISION OF  
CORPORATION FINANCE

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

April 29, 2011

Jeffrey T. Hanson  
Chief Executive Officer and Chairman  
Grubb & Ellis Healthcare REIT II, Inc.  
1551 N. Tustin Avenue, Suite 300  
Santa Ana, California 92705

**Re: Grubb & Ellis Healthcare REIT II, Inc.**  
**Form 10-K for the fiscal year ended December 31, 2010**  
**Filed March 10, 2011**  
**File No. 333-158111**

Dear Mr. Hanson:

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 filing 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 filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

Michael McTiernan  
Assistant Director

cc: Lauren Burnham Prevost  
Health D. Linsky  
Morris, Manning & Martin, LLP  
Via *facsimile*: (404) 365-9532