



DIVISION OF
CORPORATION FINANCE

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

December 31, 2012

VIA E-Mail

Mr. Brian S. Block
Executive Vice President, Chief Financial Officer
American Realty Capital Healthcare Trust, Inc.
405 Park Avenue, 15th Floor
New York, New York 10022

**Re: American Realty Capital Healthcare Trust, Inc.
Form 10-K for the year ended December 31, 2011
Filed on February 29, 2012
File No. 333-169075**

Dear Mr. Brian S. Block:

We have reviewed your filings and have the following comments. In some of our comments we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter within ten business days by providing the requested information or by advising us when you will provide the requested response. If you do not believe our comments apply to your facts and circumstances, please tell us why in your response.

After reviewing the information you provide in response to these comments, we may have additional comments.

FORM 10-K FOR THE YEAR ENDED DECEMBER 31, 2011

Item 1A. Risk Factors, page 7

1. We note your disclosure on page 4 that three tenants represent 44.4% of your annualized rental income for all portfolio properties on a straight-line basis and your tenant concentration disclosure on page 40. In future Exchange Act reports, please revise to include applicable risk factor disclosure relating to your tenant concentration, including identifying tenants whose annualized rental income represents five percent or more of your total annualized rental income or advise.

We may be unable to pay or maintain distributions from cash available from operations... page 10

2. We note your disclosure on page 60 that proceeds from issuance of common stock accounted for 100% of the total distributions (excluding distributions reinvested in your DRIP) to common stockholders for the period ended December 31, 2011. In future Exchange Act reports, as applicable, please revise this risk factor to include the percentage coverage of the shortfall in cash flow from operations for the filing period and base the percentage coverage on total distributions paid. Please make similar revisions to the distributions table on page 60 with respect to the percentage coverage based on total distributions, including amounts reinvested.

Purchases of Equity Securities by the Issuer and Affiliated Purchasers, page 46

3. We note your disclosure on page 47 that as of December 31, 2011, you redeemed or accrued the redemption of 6,241 shares at an average of \$10.00 per share for \$0.1 million due to the deaths of stockholders. In future Exchange Act reports, to the extent applicable, please revise your disclosure to include the total number of redemptions received, the number of redemption requests fulfilled and the number of redemptions that went unfulfilled during the year. If cash flow from operations is less than the redemption amount paid, please include the source of cash used to fund the redemptions requested and fulfilled.

Item 13. Certain Relationships and Related Transactions, and Director Independence, page 64

4. We note your disclosure on page F-23 relating to the compensation paid to the advisor. In future Exchange Act reports, please revise your tabular disclosure to include offering costs, including sales commissions and organization and offering costs reimbursements. In addition, please clarify whether such amounts have been paid, forgiven or are accrued but unpaid.

Financial Statements

Note 3 – Real Estate Investments, page F-15

5. We note you have included a property table which includes Net Operating Income and Annualized Rental Income per Square Foot in the footnotes to your financial statements. Given that these appear to be non-GAAP measures, please explain to us how you determined it would be appropriate to include these amounts within the footnotes to your financial statements.

Note 8 – Common Stock, page F-21

6. Please revise future periodic filings to disclose the tax status of distributions per unit pursuant to Rule 3-15(c) of Regulation S-X.

Schedule III – Real Estate and Accumulated Depreciation, page F-28

7. Please revise future periodic filings to disclose in a note to the gross amount column your aggregate cost for Federal income tax purposes. Reference is made to Rule 12-28 of Regulation S-X.

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 Exchange Act rules require. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In responding to our comments, please provide a written statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filings;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to 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.

You may contact Wilson K. Lee at (202) 551-3468 or the undersigned at (202) 551-3438 if you have questions regarding comments on the financial statements and related matters. Please contact Folake Ayoola at (202) 551-3673 or Jennifer Gowetski at (202) 551-3401 with any other questions.

Sincerely,

/s/ Robert F. Telewicz Jr.

Robert F. Telewicz Jr.
Senior Staff Accountant