



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 3561

December 22, 2016

Via E-mail

Mr. Glen Hargreaves
Interim Chief Financial Officer
Healthways, Inc.
701 Cool Springs Boulevard
Franklin, TN 37067

Re: Healthways, Inc.
Form 10-K for the Year Ended December 31, 2015
Filed March 4, 2016
File No. 000-19364

Dear Mr. Hargreaves:

We have completed our review of your filing. 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,

/s/Craig Arakawa

Craig Arakawa
Accounting Branch Chief
Office of Beverages, Apparel and
Mining