



DIVISION OF  
CORPORATION FINANCE

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

August 12, 2020

Laura Steele  
Controller  
Arrow Financial Corporation  
250 Glen Street  
Glens Falls, NY 12801

**Re: Arrow Financial Corporation  
Registration Statement on Form S-3  
Filed August 10, 2020  
File No. 333-243662**

Dear Ms. Steele:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact John Stickel at 202-551-3324 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Finance