

May 10, 2006

Mail Stop 4561

VIA U.S. MAIL AND FAX (615) 890-0123

Mr. Donald K. Daniel  
Senior Vice President and Controller  
National Health Investors, Inc.  
100 Vine Street, Suite 1202  
Murfreesboro, TN 37130

**Re: National Health Investors, Inc.  
Form 10-K for the year ended December 31, 2005  
Filed March 10, 2006  
File No. 001-10822**

Dear Mr. Daniel:

We have reviewed your response letter dated May 3, 2006 and have the following additional comment.

1. We read your response to comment 2 and reissue our prior comment in its entirety. In accordance with Rule 5-03 of Regulation S-X, you should classify the initial realized loss related to other than temporary impairments on available-for-sale securities as well as subsequent realized gains or losses on the sale of such securities as non-operating activities in your statements of operations.

\* \* \* \*

You may contact Josh Forgione, at (202) 551-3431, or me, at (202) 551-3403, if you have questions. Please respond to the comments included in this letter within 10 business days or tell us when you will provide us with a response. Please file your response on EDGAR.

Sincerely,

Steven Jacobs  
Accounting Branch Chief