

CLOVER HEALTH INVESTMENTS, CORP.
725 Cool Springs Blvd, Suite 320
Franklin, Tennessee 37067

January 25, 2021

VIA EDGAR

U.S. Securities and Exchange Commission
Division of Corporation Finance 100 F Street, N.E.
Washington, D.C. 20549
Attn: Julia Griffith

Re: Clover Health Investments, Corp.
Registration Statement on Form S-1
File No. 333-252073

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, Clover Health Investments, Corp. (the “**Company**”) hereby requests that the U.S. Securities and Exchange Commission (the “**Commission**”) take appropriate action to declare the above-referenced Registration Statement on Form S-1 to become effective on January 27, 2021, at 4:00 p.m., Eastern Time, or as soon as practicable thereafter.

The Company hereby authorizes Niki Fang of Orrick, Herrington & Sutcliffe LLP, counsel to the Company, to orally modify or withdraw this request for acceleration.

The Company requests that it be notified of such effectiveness by a telephone call to Niki Fang of Orrick, Herrington & Sutcliffe LLP at (415) 773-5540.

Very truly yours,

CLOVER HEALTH INVESTMENTS, CORP.

By: /s/ Gia Lee

Name: Gia Lee

Title: General Counsel and Corporate Secretary

cc: Vivek Garipalli, Clover Health Investments, Corp.
Stephen Thau, Orrick, Herrington & Sutcliffe LLP
William L. Hughes, Orrick, Herrington & Sutcliffe LLP
Niki Fang, Orrick, Herrington & Sutcliffe LLP