

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

Mail Stop 4628

October 16, 2018

Via E-mail
Brian Swartz
Chief Financial Officer
Cornerstone OnDemand, Inc.
1601 Cloverfield Blvd., Suite 620
Santa Monica, California 90404

Re: Cornerstone Ondemand, Inc.

10-K for Fiscal Year Ended December 31, 2017

Filed February 27, 2018

File No. 1-35098

Dear Mr. Swartz:

We refer you to our comment letter dated September 18, 2018, regarding business contacts with North Korea, Sudan and Syria. We have completed our review of this subject matter. 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/ Cecilia Blye

Cecilia Blye, Chief Office of Global Security Risk

cc: Barbara Jacobs
Assistant Director
Division of Corporation Finance

Adam Weiss Chief Administrative Officer & General Counsel Cornerstone OnDemand, Inc.