

Via Facsimile and U.S. Mail  
Mail Stop 4720

December 8, 2009

Robert A. Waegelein  
Chief Financial Officer  
Universal American Corp.  
Six International Drive, Suite 190  
Rye Brook, NY 10573

**Re: Universal American Corp.  
Form 10-K for the Fiscal Year Ended December 31, 2008  
Definitive Proxy Statement  
File Number: 001-08506**

Dear Mr. Waegelein:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Jeffrey Riedler  
Assistant Director