



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4546

April 27, 2017

VIA E-mail

Mr. Thomas A. McCarthy  
Chief Financial Officer and Executive Vice President  
Cigna Corporation  
900 Cottage Grove Road  
Bloomfield, Connecticut 06002

**Re: Cigna Corporation  
Form 10-K for the Fiscal Year Ended December 31, 2016  
Filed February 23, 2017  
File No. 001-08323**

Dear Mr. McCarthy:

We have reviewed your filing and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to these comments within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe a comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to these comments, we may have additional comments.

Notes to Consolidated Financial Statements

Note (8) Liabilities for Unpaid Claims and Claim Expenses, page 76

1. Please tell us whether the total incurred-but-not-reported (IBNR) liabilities for each accident year presented in your Global Health Care and Long-Term Disability claims development tables include expected development on reported claims as stipulated in ASC 944-40-50-4Da. If not, tell us how your presentation complies with GAAP.
2. Please tell us what consideration you gave to disclosing your methodologies for determining the presented amounts of IBNR liabilities and expected development on reported claims. In addition, tell us how claims that do not result in a liability are considered when calculating cumulative claim frequency information. Refer to ASC 944-40-50-4F.

Mr. Thomas A. McCarthy  
Cigna Corporation  
April 27, 2017  
Page 2

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.

You may contact Bonnie Baynes, Staff Accountant, at (202) 551-4924 or Sharon Blume, Accounting Branch Chief, at (202) 551-3474 with any questions. In this regard, do not hesitate to contact me at (202) 551-3679.

Sincerely,

/s/ Jim B. Rosenberg

Jim B. Rosenberg  
Senior Assistant Chief Accountant  
Office of Healthcare and Insurance