United States securities and exchange commission logo

July 16, 2021

Raul Villar Jr.
Chief Executive Officer
Paycor HCM,Inc.
4811 Montgomery Road
Cincinnati, Ohio 45212

Re: Paycor HCM, Inc.
Amendment No. 2 to

Draft Registration Statement on Form S-1

Submitted July 12,
2021

CIK No. 0001839439

Dear Mr. Villar Jr.:

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

Please respond to this letter by amending your registration statement and providing the
requested information. If you do not believe our comments apply to your facts and
circumstances or do not believe an amendment is appropriate, please tell us why in your
response.

After reviewing any amendment to your registration statement and the information you
provide in response to this comment, we may have additional comments. Unless we note
otherwise, our references to prior comments are to comments in our April 19, 2021 letter.

Amendment No. 2 to Form S-1

Selected Consolidated Financial Data, page 67

1. Give pro forma effect
to the stock split in all periods here, and elsewhere in your filing
where the number of
outstanding shares or earnings per share information is disclosed.

You may contact Claire DeLabar, Senior Staff Accountant, at (202) 551-3349 or Robert
Littlepage, Accounting Branch Chief, at (202) 551-3361 if you have questions regarding
comments on the financial statements and related matters. Please contact Mitchell Austin, Staff
Attorney, at (202) 551-3574 or Jan Woo, Legal Branch Chief, at (202) 551-3453 with any other
questions.

Raul Villar Jr.
Paycor HCM,Inc.
July 16, 2021
Page 2

Sincerely,
FirstName LastNameRaul Villar Jr.
Division of Corporation Finance
Comapany NamePaycor HCM,Inc.
Office of Technology
July 16, 2021 Page 2
cc: Robert E. Goedert, P.C.
FirstName LastName