## Mail Stop 4561

Mr. David W. Leedom Chief Financial Officer Meta Financial Group, Inc. 121 East Fifth Street Storm Lake, Iowa 50588

**RE:** Meta Financial Group, Inc.

Form 10-K for Fiscal Year Ended September 30, 2008 Form 10-Q for Fiscal Quarter Ended December 31, 2008 File No. 0-22140

Dear Mr. Leedom:

We have reviewed your response letter dated March 10, 2009 and have considered the supplemental information provided by the company. We have the following additional comments.

Form 10-K for Fiscal Year Ended September 30, 2008

Item 8. Consolidated Financial Statements and Supplementary Data

Notes to Consolidated Financial Statements

## Note 4. Securities

- 1. We note the significant unrealized losses related to your trust preferred securities at September 30, 2008. We have the following comments:
  - please provide us a full detailed analysis of these securities' impairment as of September 30, 2008 and December 31, 2008 that identifies all available evidence, explains the relative significance of each piece of evidence, and identifies the primary evidence on which you rely to support a realizable value equal to or greater than the carrying value of the investment. We may have further comment based on your response; and

Mr. David W. Leedom Meta Financial Group, Inc. March 19, 2009 Page 2 of 2

please provide us, and consider disclosing in all future filings, a table
detailing the following information for your trust preferred securities: deal
name, single-issuer or pooled, class, book value, fair value, unrealized
gain/loss, credit ratings, number of banks in issuance, deferrals and
defaults as a percentage of collateral, and excess subordination after taking
into account your best estimates of future interest deferrals and defaults.

## Exhibits 31.1 & 31.2

2. We note that you omitted paragraphs 4-5 from your certifications filed in exhibits 31.1 and 31.2. Please file an amendment to revise your certifications in exhibits 31.1 and 31.2 to include the exact language set forth in Item 6(b)(31)(i) of Regulation S-K.

\* \* \*

Please respond to these comments within 10 business days or tell us when you will provide us with a response. Please furnish a letter that keys your responses to our comments and provides any requested information. Detailed cover letters greatly facilitate our review. Please understand that we may have additional comments after reviewing your responses to our comments. You may contact Chris Harley, Staff Accountant, at (202) 551-3695 or me at (202) 551-3321 if you have questions.

Sincerely,

David Irving Reviewing Accountant