

## Compliance Today – March 2020 Meet Don Riggs: Build trust before problems arise

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Meet Don Riggs, MBA, CHC, CIA, former Chief Compliance Officer at Baptist Health in Louisville, Kentucky.

**Don Riggs** ([donlake567@gmail.com](mailto:donlake567@gmail.com)) was interviewed in late December by **Betsy Wade** ([bwade@shccs.com](mailto:bwade@shccs.com)) MPH, CHC, CNA, Corporate Compliance Officer, Signature HealthCARE Consulting Services, LLC in Louisville, KY.

Don Riggs recently announced his retirement from Baptist Health, an integrated health system headquartered in Louisville, KY, after serving the organization for 27 years. He began his career with Baptist in 1992 as the corporation's internal auditor. He then served as the director of compliance, internal audit and privacy. In 2011, he was named vice president of compliance, privacy and audit. In 2013, he was named the system's Chief Compliance Officer.

**BW:** You started your career at Baptist just before compliance programs began to emerge in healthcare. How did you make the transition from internal auditor to compliance officer, and how did your audit background contribute to your new role?

**DR:** The transition from internal auditor to compliance officer was easier than I expected. Prior to my compliance role, I had about six years under my belt as an audit leader at Baptist Health. In this role, I had the opportunity to travel to all the facilities across the Commonwealth and build relationships with senior leaders. As a result, when the compliance officer opportunity arose, I already had the trust of the leaders that is so important to launching the compliance program. The internal auditor role is based on assessing risk to the organization in many ways like the compliance officer role. It also allowed me access to all facets of the organization and the opportunity to learn strengths and opportunities that most employees wouldn't see.

In addition, many of the skills of an internal auditor are common to a successful compliance officer. As an auditor, I always had multiple audits open at the same time, which required strong organization skills. These organization skills have proven very valuable as a compliance officer for a healthcare system of eight hospitals and more than 1,600 providers.

A successful auditor and compliance officer must have excellent communication skills. Many sensitive situations arise for internal auditors and compliance officers. Progress can be impeded, and in some cases halted, if I don't communicate and utilize the emotional intelligence that is required in so many different situations. Finally, one of my favorite parts of both roles is the problem-solving skill required and the necessary ability to see through extraneous information and address the true risk to the organization. This focus on what matters most adds value to the organization and gains respect from operational leaders.

**BW:** Tell us how you started the compliance program at Baptist Health and how your role and your program evolved over time to what it is today.

**DR:** Our formal compliance program was established about the same time that the Office of Inspector General released its Compliance Program Guidance for Hospitals. We modeled our program on the seven elements of an effective compliance program. Initially, the governance structure included the development of an audit committee so that I would have the necessary reporting relationship to ensure independence. An operational leader at each hospital also assisted me with compliance duties on a part-time basis. It was valuable to have an

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operational compliance champion but, as time passed, the compliance duties expanded beyond part-time attention. As a result, we now have five compliance directors that cover our eight hospitals. My team lives in those communities and are part of the hospital leadership. We conduct internal compliance audits based on our risk assessments and government/industry guidance. We also have an expert at the system level to provide day-to-day guidance to those in the field.

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