

## The Four Pillars: How CPARS, DCMA, FAR, and the PWS Together Grade Your Training Program

Every federal training contract operates inside a regulatory and oversight architecture built from four interlocking elements. Each has its own authority, its own evaluation mechanism, and its own contribution to the contractor's performance record. None of the four stands alone — and a program that performs strongly on three of them and weakly on one is, in practice, a program that performs weakly overall.

The four pillars are the Performance Work Statement, the Federal Acquisition Regulation, the Defense Contract Management Agency, and the Contractor Performance Assessment Reporting System. Understanding how they reinforce one another is the first move in architecting a program that earns Exceptional ratings instead of Satisfactory ones.

### The PWS — your operating constitution

Of the four pillars, the Performance Work Statement is the only one written for your specific contract. The other three are government-wide regimes. The PWS is the document that translates those regimes into the requirements of *this* contract, *this* scope, *this* customer.

It specifies what you will deliver, to what standard, by what method, with what reporting. For a training contract it typically sets trainee throughput and completion standards, curriculum and learning-objective requirements, instructor qualification and recurrency requirements, the records and reports you must maintain, and — increasingly — an explicit requirement to operate and document a continuous-improvement loop based on outcome data.

The PWS sets the baseline every other pillar grades you against. A program that meets PWS requirements is positioned for Satisfactory. A program that demonstrably *exceeds* the PWS — particularly on the categories where the PWS sets only a floor — is positioned for Very Good or Exceptional. Defensibility starts with PWS compliance and is earned in PWS-exceeding performance.

### FAR Subpart 42.15 — the past-performance regime

The Federal Acquisition Regulation governs how agencies collect, evaluate, and use past-performance information. Subpart 42.15 is the operative piece: it establishes when CPARS evaluations are required, how they are prepared, and what rights the contractor has in the process. Federal civilian agencies follow the FAR directly; the Department of Defense follows the FAR plus DFARS Subpart 242.15 and additional policy.

A few specifics worth getting exactly right, because contracting officers do. Under FAR 42.1502, evaluations are required for each contract and order that exceeds the Simplified Acquisition Threshold (\$350,000), for construction contracts of \$900,000 or more, and for architect-engineer contracts of \$45,000 or more. (On DoD work, a class deviation sets a \$1 million reporting threshold for services and IT.) The contractor's right to comment lives in FAR 42.1503(d) — up to 14 calendar days from notification, with review at a level above the contracting officer to resolve disagreements.

The single most important thing the FAR requires: evaluations must rest on **actual performance data**, not subjective impression. That requirement is the hinge that connects CPARS to surveillance. The narrative has to be backed by documented objective evidence — and the entity that produces that evidence is the third pillar.

## **DCMA — where the evidence is made**

The Defense Contract Management Agency (and its civilian-agency equivalents) performs the on-the-ground contract administration: quality-assurance surveillance, deliverable inspection, records review. DCMA does not write the CPARS narrative. But DCMA's surveillance findings are the primary objective evidence the contracting officer uses when the narrative *is* written.

For each contract, DCMA writes a Quality Assurance Surveillance Plan — the QASP. It defines what will be inspected, how often, by what method, and to what acceptance standard. On a training contract, the QASP typically puts surveillance on curriculum compliance, instructor qualifications, training delivery, trainee outcomes, recordkeeping, and the continuous-improvement loop.

Findings range from minor observations the contractor corrects within a set window up to Corrective Action Requests at escalating levels, with the more serious CARs requiring formal response and remediation under contracting-officer oversight. The accumulated surveillance record across a performance period — the findings, the CARs issued and closed, the pattern of repeat findings or repeat clean inspections — is the raw material the contracting officer synthesizes into the CPARS narrative.

This is the practical reason the QASP matters so much: it is, in effect, the contractor's specification for what the records architecture has to produce on demand. Read your QASP as a build spec.

## **CPARS — the compounding asset**

The Contractor Performance Assessment Reporting System is the government's central repository for past-performance information. Evaluations are written at least annually during performance and at contract completion, rating the contractor on the five-level scale — Exceptional, Very Good, Satisfactory, Marginal, Unsatisfactory — each with a narrative justification, across categories like Quality, Schedule, Cost Control, Management, Small Business Subcontracting, and Regulatory Compliance. For training, Quality is the category where Level 3 and Level 4 outcome evidence either holds or it doesn't.

Those narratives become available to source-selection officials evaluating future bids. Officials are required to weigh past performance on most negotiated procurements, and CPARS is the primary source. That is where the compounding lives: a five-year record of Exceptional ratings enters a new bid as the past-performance benchmark; a five-year record of Satisfactory enters as a tier-two competitor; even one Marginal rating in a relevant window enters as a risk flag for a cautious source-selection official.

CPARS is not a report card in the soft sense. It is a binding asset class that accumulates or erodes based on the substantive defensibility of your performance.

## **The loop is closed**

Put the four together and they form a self-reinforcing loop. The PWS sets the baseline. DCMA surveillance measures performance against it continuously and produces the finding record. The contracting officer, drawing on that record under the procedural framework of FAR 42.15, writes the CPARS evaluation. The evaluation enters the contractor's past-performance record and shapes future source selections. Those selections shape which contracts the contractor wins — which shapes the next PWS, the next surveillance, the next CPARS narrative.

A program architected to perform demonstrably at the Exceptional level across all four pillars enters each new bid stronger than the cycle before. A program architected only to satisfy the minimum enters each new bid in a position that erodes over time, as competitors with stronger records win the

contracts that would have been theirs.

That is the program architect's real operating environment. Designing only to the PWS, without attention to the DCMA and CPARS layers above it, produces records that survive routine inspection but are not optimized to give the contracting officer Exceptional-worthy language to work with. Designing with the full regime in view — PWS met as the floor, surveillance anticipated as a continuous condition, narrative-supportive evidence produced as a byproduct of operations, and FAR procedural rights exercised when warranted — produces a fundamentally different posture, and a fundamentally different CPARS record.

### **What comes next in this series**

This is the fourth of ten posts I'm writing this summer drawn from Reference Volume 5 of the McLean Performance Group practice library — *Federal-Contract Training Defensibility: The Architect's Reference for CPARS-Exceptional Programs*.

The next post, Tuesday June 23, goes to the layer where the Quality rating is actually won or lost: Kirkpatrick Levels 3 and 4 — behavior change on the job and mission results — and why that is where Exceptional CPARS actually gets earned.

If federal training defensibility is on your operational plate — as program manager, proposal lead, contracting officer representative, or senior consulting principal — this series is written for you.

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