



**LIMITED-SOURCES JUSTIFICATION
ORDERS OR BPAS EXCEEDING THE SIMPLIFIED ACQUISITION THRESHOLD
J&A-25-0092**

This acquisition is conducted under the authority of the Multiple-Award Schedule Program, 41 U.S.C. 152(3), Competitive Procedures, and 40 U.S.C. 501, Services for Executive Agencies.

1. Agency and Contracting Activity.

The Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Office of Acquisition Management (OAQ), on behalf of the Office of the Chief Information Officer (OCIO) Solutions Delivery Division (SDD), proposes to modify Task Order 70CTD022FR0000170, pursuant to Federal Acquisition Regulation (FAR) 8.405-6(a) Limiting Sources.

2. Nature and/or description of the action being approved.

- (a) Type of action: Modification to existing Firm-Fixed-Price (FFP) Task Order
- (b) Amount the current LSJ is justifying [REDACTED]
- (c) Brief Description: OAQ intends to modify Task Order 70CTD022FR0000170 on a limited source basis to the following company:

Palantir Technologies, Inc.
1200 17th Street, Floor 15
Denver, CO 80202

3. Description of Supplies/Services.

ICE Enforcement and Removals Operations (ERO) urgently requires the following system capabilities and outcomes, hereby referred to as ICE's Immigration Lifecycle Operating System (ImmigrationOS), in support of Presidential Executive Orders including EO 14159 - Protecting the American People Against Invasion and Executive Order 13773 - Enforcing Federal Law With Respect to Transnational Criminal Organizations and Preventing International Trafficking:

- Targeting and Enforcement Prioritization, which includes streamlining selection and apprehension operations of illegal aliens based on ICE enforcement priorities—especially affiliates of known transnational criminal organizations (TCOs), violent criminals, and visa overstays.
- Self-Deportation Tracking, which includes near real-time visibility into instances of self-deportation and integration with enforcement prioritization systems to inform policy, ensure efficient appropriate resource allocation, and accurately report metrics of alien departures from the United States.
- Immigration Lifecycle Process, which includes streamlined end to end immigration lifecycle from identification to removal, with increased efficiency in deportation logistics, minimizing time and resource expenditure.



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ICE requires software licenses, configuration services, engineering services, and hosting services in order to obtain a prototype of ImmigrationOS prior to September 25, 2025. ICE proposes to modify the existing Investigative Case Management (ICM) System Task Order 70CTD022FR0000170 in order to procure these services. A summary of the existing Task Order value and the proposed modification is contained in the table below:

	Period of Performance
Base Period	9/26/22 – 9/25/23
Option Period 1	9/26/23 – 9/25/24
Option Period 2	9/26/24 – 9/25/25
Option Period 3	9/26/25 – 9/25/26
Option Period 4	9/26/26 – 9/25/27
Total	

The overall Period of Performance (PoP) of the Task Order will remain unchanged with a 12-month base period and four 12-month options from September 26, 2022 – September 25, 2027. The proposed modification for ImmigrationOS would have a PoP from April 14, 2025 through September 25, 2025 at an estimated cost of [REDACTED]. The proposed modification would increase the task order value from [REDACTED] by [REDACTED] to [REDACTED].

4. Authority and supporting rationale and a demonstration of the proposed contractor's unique qualifications to provide the required supply or service.

Authority:

Select only one of the following circumstances justifying limiting sources pursuant to FAR 8.405-6(a)(1)(i) below and demonstrate the proposed contractor's unique qualifications to provide the required supply or service.

- ☒ 8.405-6(a)(1)(i)(A) An urgent and compelling need exists, and following the ordering procedures would result in unacceptable delays.
- ☐ 8.405-6(a)(1)(i)(B) Only one source is capable of providing the supplies or services required at the level of quality required because the supplies or services are unique or highly specialized.
- ☐ 8.405-6(a)(1)(i)(C) In the interest of economy and efficiency, the new work is a logical follow-on to an original Federal Supply Schedule order provided that the original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures. The original order or BPA must not have been previously issued under sole-source or limited-sources procedures.

Rationale:

ICE has determined that an urgent and compelling need exists to deliver the ImmigrationOS capabilities as soon as possible. Lacking these three critical system capabilities (Targeting



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and Enforcement Prioritization, Self-Deportation Tracking, and Immigration Lifecycle Process) severely limits ICE's ability to execute the President's Executive Orders and the ability to effectively target transnational organizations, such as Tren de Aragua (TdA) and La Mara Salvatrucha (MS-13), who pose national security threats to the United States. These transnational organizations' ongoing campaigns of violence and terror in the United States and internationally are extraordinarily violent, vicious, and similarly threaten the American people. They present an unusual and extraordinary threat to the national security, foreign policy, and economy of the United States. It is essential that ICE obtain these capabilities as soon as possible to enable ICE in targeting and apprehend cartels and other transnational organizations, such as TdA and MS-13.

Palantir is the only source that can provide the required capabilities and prototype of ImmigrationOS without causing unacceptable delays. ICE currently employs Palantir's commercial software as the Investigative Case Management (ICM) System for the Homeland Security Investigations (HSI). ICM is based on Palantir's proprietary solution that has already been configured specifically for ICE's operational needs and meets all critical requirements required by EO 14159. The existing infrastructure already built under ICM can be further configured to meet ICE's urgent needs without time consuming development.

The current ICM system is the official system of record for all HSI investigative cases, utilized by special agents, criminal analysts, and support personnel both domestically and internationally. ICM enables users to make connections between subject records across various systems, conduct target telephone and address searches, link to seizures made in other jurisdictions, and connect various cases and organizations through reports of investigations. ICM also supports enforcement actions against immigration violators and interface with other systems, including Lead Tracker, to manage ICE's intake, triage, analysis, tasking, and enforcement disposition of executable final orders of removal. These connections allow for the centralized management of all interior enforcement priorities of criminal aliens. Palantir's proprietary technology provides sophisticated analytical capabilities, including deconfliction of data to ensure each subject has one consolidated record, enhanced search using both structured and unstructured queries, workflow capabilities supporting internal case review and approval, data sharing with Customs and Border Protection for lookout and seizure tracking, and daily data export to the analytical system for further analysis. The integrated analytical system on top of ICM enables ICE to discern relationships that help identify criminal networks, promoting investigation and contributing to dismantling criminal organizations.

Palantir's systems are already ingesting and processing data from multiple ICE, DHS, and external sources necessary to deliver these capabilities; this allows ICE to leverage the existing infrastructure already in the ICE environment to accelerate the timely delivery for ImmigrationOS. Because the Palantir software is already configured to support the ICE mission and environment and already has an existing approved Authority to Operate (a process alone that can take several months to approve) the Palantir Platform solution is the only available source capable of meeting the immediate needs for the ImmigrationOS capability without significant time and development. Palantir has developed deep institutional knowledge of ICE operations over more than a decade of support, and their systems have been tailored to meet strict DHS security and privacy standards. Their unique



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system integrations with ICE Data and ability to link to immigration data, leads, and the tracking of those leads ensures continued operational efficiency and national security. Introducing a separate vendor and solution could disrupt ongoing investigations and operations, potentially compromising national security. Furthermore, Palantir has the cleared resources ready and available to start immediately. No other vendor could meet these timeframes of having the infrastructure in place to meet this urgent requirement and deliver a prototype in less than six months. Any other vendor would require additional time to procure, onboard cleared staff, and would require significant time to develop capabilities that would cause an unacceptable delay in meeting the mission to support the EOs to protect the American people.

5. Determination by the ordering activity contracting officer that the anticipated order represents the best value consistent with FAR 8.404(d).

The Contracting Officer (CO) determines that issuing a modification, for support to ICE's ImmigrationOS to Task Order number 70CTD022FR0000170 represents the best value to the Government. This task order is placed in accordance with FAR 8.404, Use of Federal Supply Schedules. The General Services Administration (GSA) has already negotiated fair and reasonable pricing in their contractually established rates. OAQ will investigate pricing extended to other Federal agencies for substantially similar procurements and seek additional discounts from the GSA schedule rates in accordance with FAR 8.405-4, Price Reductions. Additionally, prior to issuance of the modification, OAQ will consider the licensing fees and quantities, level of effort and the mix of labor proposed to perform the requirements as identified in the Performance Work Statement (PWS) in order to determine that they are commensurate to the work being performed, thereby supporting a determination that the total price for the modification is fair and reasonable.

6. A description of the market research conducted among schedule holders and the results, or a statement of the reason market research was not conducted.

As part of the market research efforts in support of the follow-on ICM requirement, ICE has evaluated existing information systems, software applications, and vendors who may be capability of addressing the project's requirements. Market surveys included internet research, product trials of commercial software, including a prototype / pilot with Palantir, evaluating the FedRAMP marketplace, and meetings with DHS and DoD stakeholders who have required similar capabilities. These surveys identified several potential products and vendors; however, most offered to custom develop new software applications or relied on large teams of services contractors to provide similar capabilities, and required long lead-times to develop, migrate existing data, training, and fully transition / deployment of new platform / system. Given the mission criticality and urgency of EO 14159, Protecting The American People Against Invasion, the timelines to procure a new platform / system with a new vendor is unacceptable and would result in harm to national security.

7. Any other facts supporting the limited-sources justification. Additional facts may be stated in this section. If there are no additional facts, you must state that here.

Not applicable.



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- 8. A statement of actions, if any, the agency may take to remove or overcome any barriers that led to restricted consideration (i.e., limited-sources) before any subsequent acquisition for the supplies or services is made.**

ICE will continue to research opportunities to remove any barriers to competition for this procurement with each option year and future recompetes. This ensures that the services/products provided remain aligned with the evolving needs of the agency and reflect current market conditions and best practices

- 9. DHS intends to post this requirement on sam.gov pursuant to FAR 8.405-6(a)(2).**

- 10. Technical/Requirements Personnel Certification.**

Pursuant to FAR 8.405-6(c)(2)(x), I certify that this requirement meets the Government's minimum need and that the supporting data, which form a basis for the Limited-Sources Justification, are accurate and complete.

[Redacted Signature]

Date

Technical Representative/COR

- 11. Contracting Officer Certification**

[Redacted Signature]

Date

Contracting Officer

- 12. Approval.**

Pursuant to FAR 8.405-6(c)(2)(xi), I hereby determine the circumstance identified in Section 4 applies.

[Redacted Signature]

Date

Competition Advocate

[Redacted Signature]

Date

Deputy Head of Contracting Activity