HHS Federal Supply Schedule (FSS) Limited-Sources Justification

Acquisition Title: AURORA Operations, Sustainment, And Agentic AI Deployment
Agency: Advanced Research Projects Agency for Health (ARPA-H)
Acquisition Year (FY): FY26
Author: [redacted] – Contract Specialist (CTR); [redacted] – Contract Specialist (CTR)

1. Description of Action:

Nature:	☐ New Requirement	☒ Follow-on Requirement	
	☐ Modification to Existing Order Number:	PIID No:	
Pricing:	☒ Firm-Fixed Price	☐ Time & Materials	☐ Cost
	☐ Other:	Describe:	
Funds:	☒ RMA	☐ Other Funds:	

Name of Proposed Contractor(s):
Palantir Technologies, Inc.

Street Address:
518 17th St. Suite 1015

City, State, Zip
Denver, CO 80202-4126

2. Description of Supplies and Services to Include Contract Vehicle/Number Utilized:

This limited source justification supports the award of a short-term follow-on task order to the incumbent contractor, Palantir Technologies, Inc. (Palantir) (CAGE 470F5), for management, operation, and sustainment of ARPA-H's Data Program Management Organization (DPMO) and related Advanced Unified Reporting and Organizational Resource Analytics (AURORA) platform. Under the current task order (75N95023D00027/ 75N95024F00003), Palantir was required to establish a DPMO and associated tools to enable data governance and analytics to provide insight on agency operations. Under this follow-on task order, the contractor is required to provide all services and software licenses to sustain existing DPMO & AURORA functions as well as deploy additional functionalities which are required during the performance period (anticipated 1 June 2026 through 31 May 2027, including options). This action is being taken under Palantir's GSA Multiple Award Schedule contract, 47QTCA-24-D-004L.

The contractor is required to sustain ARPA-H's DPMO and its AURORA system by furnishing all required personnel, services, software licenses, and cloud infrastructure to enable effective organizational data management and analysis. The contract also contains an option for one additional task integrating Agentic Artificial Intelligence agents into the DPMO environment to accelerate ARPA-H's mission. The estimated value of this requirement is [redacted] for the one-year contract period.

Under Task 1, the contractor will be responsible for Project and Contract management services. Under the project and contract management requirements, the contractor is responsible for staffing, schedule, and deliverable management. Additionally, the contractor is responsible for all project, communication, and Agile configuration management tasks.

Under Task 2, the primary technical task of the contract, the contractor will be responsible for DPMO Operations, sustainment, and workflow deployment. ARPA-H's DPMO requirement is to provide services and infrastructure to capture and analyze agency data (e.g. program management, procurement, financial, human resources, etc.), as well as provide workflows and tools to accomplish several critical agency functions. Operation of these functions requires the contractor to inventory and integrate multiple data sources and other agency systems in a cloud environment adhering to federal security standards.

Under this task, ARPA-H requires the operation of several critical tools that support agency operations, including:

Innovative Solution Opening (ISO) Management: AURORA's ISO Management Tool streamlines the review, selection, and response process for ARPA-H ISOs by centralizing submissions and reviews to simplify auditing and allow users to track progress at every step, automating conflict-of-interest management and response letter generation, and enabling collaborative review and feedback drafting.

Division of Government Relations and Strategy (DGRS)/Division of Communications, Outreach, Marketing, Public Affairs, and Social Strategies (COMPASS): The DGRS and COMPASS homepages in AURORA provide insights into ARPA-H's R&D Activities across congressional districts, states, and performers; enabling these teams to quickly understand and translate to external stakeholders where funds are flowing, what research is being conducted, and which organizations are involved. Additionally, these views allow the teams to gain clarity into upcoming key dates.

Program Approval Document Routing and Approval: AURORA's PAD Submission & Routing Tool centralizes and provides insight into the approval process for R&D Activity PADs while ensuring structured data is captured in a single, versioned repository. AURORA automates routing and notifications to eliminate manual, email-driven workflows and enhances process transparency.

Mission Control: AURORA's Mission Control equips ARPA-H mission offices with an interactive, end-to-end workspace for financial oversight, budget forecasting, and program management. Mission controls give users transparency into budgets, obligations, commitments, and awards and enable investigative drilldowns from agency-level funds to individual activities, vendors, and transactions.

Executive Suite: AURORA's Executive Suite provides ARPA-H leadership with a real-time, consolidated dashboard of agency financials, program activity, and key operational metrics, enabling rapid, data-driven decision-making, transparent reporting, and actionable insights for executive briefings and portfolio management.

Budget Execution Tower: AURORA's BUDGET Execution Tower provides the Comptroller Office with a unified, real-time platform for budget reconciliation, spend tracking, and fund approval. It automates data validation and provides dynamic reporting and analytics to reduce manual processes to ensure accurate, transparent, and efficient budget execution across ARPA-H.

Congressional Briefer: AURORA's Congressional Briefer automates the creation of tailored impact briefs for congressional members. Providing staff the capability to select a member or district and instantly generate summaries showing how ARPA-H funding has impacted their constituency, including details on contracts, awards, and local institutions.

Awards Clearinghouse: AURORA's Awards Clearinghouse provides ARPA-H a mechanism for standardized, traceable entry and tracking of awards data. It centralizes award information, enforces consistency in data entry, and creates an authoritative record of award status. The Clearinghouse supports transparency, auditability, and linkage of award details to related modules (e.g., PAD, Mission Control).

Task 3 of the PWS is included as an option. Task 3 provides for the deployment of Agentic AI technology on the AURORA platform. Task 3, if awarded, would require the contractor to provide all software and services required to deploy AI agents capable of automating certain ARPA-H workflows related to data processed by AURORA, enhancing problem solving and applying business rules, orchestrating data across multiple sources and monitoring data feeds, as well as assisting in the preparation of briefing materials, and other similar activities.

For all tasks under this PWS, the contractor must adhere to federal standards for IT acquisitions. The environment must be FedRAMP certified at the moderate level, and support security controls aligned to NIST SP 800-53. The system must obtain an Authorization to Operate (ATO) and integrated dashboards for mission-critical decision-making. The requirement is for the contractor to provide an integrated set of data management services, related software licenses & cloud-based infrastructure, and agile support services that collectively enable uninterrupted operation of AURORA as the primary tool for the DPMO.

The estimated value of the proposed action, including all options, is [redacted]

3. Authority:

☐ An urgent and compelling need exists, and following the procedures would result in unacceptable delays (FAR 8.405-6(a)(1)(i)(A)).

Not Applicable

☒ Only one source can provide the supplies or services required at the level or quality required because the supplies or services are unique or highly specialized (GSAR 538.7104-3(b)(1)(ii)).

This action is being undertaken in accordance with the authorities of 41 USC 21 and 40 USC 501, as implemented by Revolutionary FAR Overhaul (RFO) 8.401(b)(HHS Class Deviation 2025-09 Amd. 1), and GSA Acquisition Regulation (GSAR) 538.7104-3(b)(1)(ii) – Only one source is capable of providing the products, services, or solution required at the level of quality required because the products, services, or solutions are unique or highly specialized.

ARPA-H has conducted substantial market research with respect to this requirement, and while alternate platforms and service providers exist with the technical capability to meet these needs, all would require extensive configuration to fulfill the covered business processes (see Block 2 for existing functionalities sustained in this requirement). To fulfill the contract requirements, commercial platforms, regardless of out of the box capability, require integration with external data sources, implementation of data governance, as well as development and configuration of workflow tools which ARPA-H does not anticipate being complete within the required timeframe to support agency operations.

Palantir Technologies has been identified as the only source capable of delivering the required services at the required quality level within the timeline needed to maintain operation of this critical agency resource. As the incumbent contractor for this requirement, Palantir has configured and integrated its commercial software product to fulfill the core requirements of this PWS. Development of the data governance models and associated infrastructure for AURORA's existing functionality has taken approximately 20 months to date.

An incoming contractor would incur substantial start-up cost, time, and effort to implement the data integrations, governance, orchestration and deploy tools capable of fulfilling the agency's analytics and workflow requirements. Additionally, as a FedRAMP certified platform, Palantir Foundry, the current basis of AURORA, meets the security requirements, and the existing AURORA software has achieved an ATO. A new contractor would be required to develop and submit a new ATO package for review and approval.

The current contract expires on June 5, 2026. ARPA-H requires continuous functionality of the capabilities provided by the DMPO requirement and the AURORA tool. ARPA-H is procuring this follow-on as a short-term bridge task order to facilitate development of sufficient documentation and requirements to pursue a competitive follow-on contract for a long-term requirement, preferably leveraging an HHS strategic sourcing vehicle if one becomes available. While the costs and effort associated with these development efforts may be recouped over a longer-term award, it is expected that the Government would incur substantial additional costs to re-develop this capability for a short-term requirement.

Accordingly, owing to the substantial duplication of cost for a short-term requirement, as well as the time need for a new contractor to implement a comparable solution, ARPA-H has determined that the incumbent contractor, Palantir Technologies, is the

only source capable of providing the required services for this short-term bridge task order.

☐ 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 (FAR 8.405-6(a)(1)(i)(C)); or

Not Applicable

☐ An item peculiar to one manufacturer can be a particular brand name, product, or a feature of a product, peculiar to one manufacturer). A brand name item, whether available on one or more schedule contracts, is an item peculiar to one manufacturer. (FAR 8.405-6(b)).

Not Applicable

4. Market Research:

ARPA-H conducted market research among GSA MAS schedule holders and other leading commercial providers to determine whether alternative vendors could meet ARPA-H's near-term need to sustain the AURORA system during a bridge period not to exceed one year.

The government conducted market research through review of MAS schedule vendors and research regarding the capabilities of their offerings, and by considering results of a related RFI. The agency searched GSA MAS catalogs and contractor websites for data platform and analytics solutions capable of enterprise-scale integration, analytics, and governance. The agency identified and reviewed solutions from multiple schedule contractors, including platform offerings comparable to Databricks, Snowflake, SAS Viya, and Microsoft Azure Government-based stacks.

The agency subsequently compared the capabilities of these vendors identified platforms against requirements for the DPMO and associated IT platform, focusing on:

- Semantic/ontology layer and support for complex ARPA-H entities and workflows.
- Integration of operational and analytical workspaces (closed-loop decisioning).
- Fine-grained access control, lineage, and governance features to support auditability and stakeholder transparency.
- Real-time pipeline orchestration, versioned data assets, and support for mission-critical applications already in production.

ARPA-H then assessed whether any schedule holder could provide an integrated solution that could sustain existing AURORA capabilities within the one-year bridge period without major redevelopment. ARPA-H determined through its market research that though these alternate

platforms may be capable of sustaining DPMO operations over the long term once implemented, there is substantial schedule and continuity of operations risk in transitioning vendors for this short-term requirement, as well as a risk of substantial cost duplication for re-development. The identified platforms possess many of the core features required for the data management and analytics functions performed, however none possess out of the box capabilities to fulfill all of ARPA-H's requirements, as all any new provider would need to do substantial requirements gathering, analysis and integration of data sources, implementation of data governance, development and configuration of workflows and applications to meet the agency's requirements. This implementation process would introduce substantial schedule, quality, and cost risk, and jeopardize ongoing performance of numerous critical business processes.

5. Actions to Increase Competition:

During the bridge period, ARPA-H will conduct additional market research, both among MAS schedule holders and any HHS strategic sourcing vehicles, to refine the functional, technical, and data-governance requirements for AURORA-like capabilities. In its requirements for this bridge contract, the agency has included provisions to document and standardize AURORA's architecture, including data models, interfaces, pipelines, and security controls, using open standards and exportable formats to better enable future competition and potential transition to other vendors. In addition, ARPA-H will structure data and intellectual property rights in the bridge action and the follow-on requirement to ensure the Government has sufficient rights to data, configurations, and documentation to successfully compete follow on acquisitions for these requirements.

6. Any other facts supporting the justification:

Not Applicable

7. **Technical / Requirements Certification:** By my signature below, I certify that the supporting data under my review which is included in this Limited-Sources Justification is accurate and complete.

Program Manager	
Name:	[redacted]
Position Title:	Assistant Director, Program Management
Email address:	[redacted]
Phone:	N/A
One level above Program Manager	
Name:	[redacted]
Position Title:	Chief Information Officer – ARPA-H
Email address:	[redacted]
Signature:	[redacted]
Date:	5/5/2026

8. **Best Value Determination:** By my signature below, after review of the relevant documents, I have determined that the order subject to this Limited-Sources Justification represents the best value for the government as set forth in FAR 8.404(d) and constitutes a fair and reasonable price. The basis for my determination is as follows:

The ordering activity contracting officer determines that this limited-sources bridge order represents the best value to the Government when considering price, technical capability, continuity of operations, risk, and cost avoidance, in accordance with FAR Overhaul Deviation 8.401(b), GSAR 538.7104-3(b)(1)(ii), and the ordering procedures under GSAR 538.7102-2(b). The ordering activity will ensure that the order represents the best value to the Government through several means. The bridge order is intentionally time-limited and scoped for continuity and essential enhancements only, while ARPA-H completes requirements development and conducts a separate, competition for a longer-term solution. This approach avoids premature, high-risk re-platforming while preserving the Government's ability to leverage full competition and price/technical innovation in the follow-on acquisition. Additionally, the order will utilize pricing established under the contractor's MAS contract, at prices already determined fair and reasonable, and the ordering activity may seek additional discounts as appropriate. Price is therefore considered in the context of the mission benefit, cost and schedule risk avoided, and the short-term bridge nature of the requirement.

9. **Contracting Officer's Approval** I hereby certify that this justification is accurate and complete to the best of my knowledge. I approve this justification subject to the availability of funds and provided that the services and supplies herein as described have otherwise been approved for acquisition.

Name:	[redacted]	Phone:	N/A
Signature:	[redacted]	Date:	4/30/2026

10. **Legal Counsel Review:**

Not Required

11. **OPDIV Competition Advocate Approval** (Required for proposed contract over $700,000 but not exceeding $13.5 million (value calculated including all options)): I have reviewed this justification and find that it adequately supports limiting sources.

Name:	[redacted]	Phone:	N/A
Signature:	[redacted]	Date:	5/5/2026

12. **Office of Small and Disadvantaged Business Utilization:**

I have reviewed this justification and find that it adequately supports limiting sources.

Name:		Phone:	
Signature:		Date:	