

A Clinical Proceedings White Paper

October 2025



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About the National Coalition for Infant Health

The National Coalition for Infant Health is a collaborative of professional, clinical, community and family support organizations. The coalition focuses on education and advocacy promoting patient-centered care for all infants – whether born preterm or full term – and their families.



About Clinical Proceedings

The coalition's Clinical Proceedings educate and raise awareness about issues impacting infants and their families. The coalition recognizes the expert panel members who contributed to the development of this white paper and acknowledges the professional writing assistance of Amy Sullivan, PhD, with Obrizus Communications



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Not All Premature Infants are Created Equal

In the United States, approximately 10% of infants are premature,² equating to just over 380,000 infants per year.3 Of these, just under 49,000 (1.36% of all births)4,5 are born with a very low birth weight (less than 1500 grams), putting them at greater risk of morbidity and mortality. The actual cause of preterm delivery is often unknown, although higher rates of premature birth have been associated with certain demographic factors (e.g., age, socioeconomic status), medical history/conditions (e.g., prior preterm birth, carrying multiples, preeclampsia) and behavioral characteristics (e.g., drug or alcohol use).^{2,6} Preterm births also disproportionately affect Black women, since their rates are about 50% higher (14.6%) than White (9.4%) and Hispanic women (10.1%).2 However, due to race being a social construct, studies have consistently found that racial disparities in preterm birth rates are not due to biological differences between races.2

"Both weight and age contribute to the risk factors a premature infant faces. For example, the developmental challenges of a 500-gram baby born at 24 weeks will be different from the challenges faced by a 500-gram baby born at 28 weeks."

- Kate Tauber, MD, MA

Premature infants can be classified into different groups based on their gestational age and/or their weight at birth.^{6,7}

Gestational age:

- Moderate to late preterm:32 to 37 weeks
- Very preterm:28 to less than 32 weeks
- Extremely preterm: less than 28 weeks

Birth weight:

- Low birth weight (LBW): less than 2500 grams (~5.5 pounds)
- Very low birth weight (VLBW): less than 1500 grams (~3.3 pounds)
- Extremely low birth weight (ELBW): less than 1000 grams (~2.2 pounds)

Extremely and very preterm infants haven't experienced all the rapid organ growth and maturation that normally occurs in utero during the third trimester of pregnancy (after 28 weeks of gestation). Thus, it is essential that these infants are given all the nutrients needed to continue their growth and development outside the womb. Providing such nutrition can be complicated due to an underdeveloped gastrointestinal (GI) system, lack of the ability to suck and/or swallow and difficulties coordinating feeding and breathing, which may make it impossible for these infants to receive the critical nutrients they need through breast or bottle feeding. Therefore, premature infants may be provided nutrients in a variety of ways to meet their needs.

Parenteral nutrition (PN)

PN is a solution that is formulated by healthcare providers (doctors, neonatal nurse practitioners, physician assistants, registered dietitians and pharmacists) to supply infants with the carbohydrates, proteins, fats, vitamins, minerals and fluids that they need to grow and develop. PN is best given to premature infants intravenously through a dedicated central line; however, this route does increase the risk of central line-associated bloodstream infections (CLABSI). The decision to give PN depends on the size, gestational age and clinical status of the infant. Typically, infants that are born before 32 weeks of gestation and/or weighing less than 1500 grams will start with PN on the first day of life. Older preterm infants will be given PN if it is clinically warranted. As the infant develops and can tolerate more enteral nutrition, the use of PN is tapered off until it is no longer needed.⁸

Enteral nutrition

Enteral nutrition refers to nutrients and fluids that are given either by mouth (swallowed) or through a feeding tube that goes into the baby's stomach. Ideally, enteral nutrition is provided in the form of the mother's own milk (MOM); however, if MOM is unavailable or additional nutrients are required, then donor human milk and/or fortifiers may be used.º The standard of care for enteral feeding of a premature infant is to start at a designated volume of milk/fortifier and then incrementally increase the volume and number of calories provided until specific amounts, as determined by NICU guidelines, are reached. The size and gestational age of the infant helps determine how and when enteral feeds are started as well as how they are advanced (volumes and calories increased) in order to minimize the risk of feeding intolerance and NEC. As feeds are advanced, any remaining nutrients and fluids that aren't given by mouth/feeding tube are provided by PN until the infant has reached full feeds.

"Most premature babies won't be able to suck, swallow and breathe for feeding until 34 to 35 weeks of gestation, so, up until that time, human milk-based nutrition must be given through a nasogastric tube."

- Dan Stewart, MD



[&]quot;We use oral care with the mother's breast milk, particularly colostrum, to enhance the microbiome of the baby. Studies have shown that this practice decreases the time it takes to get to full feeds."

- Dan Stewart, MD

While PN is critical for the treatment of premature infants, it cannot provide the nutrients that they need in the long term. This is because long-term use of PN can lead to other complications, including parenteral nutrition-associated liver disease (PNALD) and osteopenia of prematurity. In addition, the method of delivery of PN (through a central line) is associated with an increased chance of infection.8 Therefore, the goal is to transition premature infants to full enteral feeds as soon as possible and limit the amount of time they spend on PN.

What is an Exclusive Human Milk Diet?

The American Association of Pediatrics recommends that preterm infants exclusively receive human milk, preferably MOM. If MOM is unavailable, then donor human milk should be used.9 Furthermore, because MOM and donor human milk do not have the energy and protein required to meet the growth and development demands of the VLBW infant, human milk with fortification is the standard of care. 11 When premature infants are given either MOM or donor milk (or a combination of both) along with a human milk-based fortifier, they are said to be on an exclusive human milk diet (EHMD). Such a diet is optimal for premature infants because their immature digestive systems can have problems processing proteins from cow's milk (also called bovine milk). Such difficulty usually persists until around 34 weeks of gestational age.

Exclusive Human Milk Diet (EHMD)

An exclusive human milk diet consists of:

- Mother's own milk (MOM)
 - Donor human milk
 - Human milk-based fortifiers

Mother's own milk (MOM)

MOM is the milk that is produced by the mother of the baby. Importantly, MOM changes over time to meet the baby's needs. For the first few days after giving birth, colostrum is the type of milk that is produced. Colostrum is rich in nutrients and bioactive factors that help promote the baby's development, particularly the immune system and the GI tract.^{12,13} Over the next few weeks, the milk transitions to mature milk, which has less protein and more carbohydrates and fat than colostrum.¹⁴ For those premature infants who are initially unable to breastfeed, their mothers must pump to collect milk for feedings and promote continued milk production.

"Mother's own milk is gold because it's adaptive to the unique needs of the baby."

- Carlie Austin, BSN, RN

Donor human milk

Donor human milk is milk that is donated by mothers to be used by infants that aren't their own. Donors are first screened by providing a health history and blood for testing to make sure that they are healthy and eligible to donate milk. Once the milk is donated, it is pooled with milk from other donors and then pasteurized to kill any bacterial or viral contaminants. The milk is then tested to make sure that the pasteurization process worked before it is frozen and stored until needed. Unfortunately, due to the pasteurization and freezing processes, donor human milk has a lower nutrition content and fewer active components (e.g., antibodies) than MOM.^{12,15,16} When donor milk is collected and distributed by a milk bank, the exact composition of the final milk product is unknown and can vary from batch to batch.¹⁵ However, commercial distributors of donor milk complete extra testing to determine the nutrient composition

(calories, protein and fat) of each batch, which is then adjusted so that each batch has similar amounts of each of these nutrients.

"I would advocate for using mother's own milk 100% of the time, but, unfortunately, we do have mothers that aren't able to produce enough or are on medications that are contraindicated to breastfeeding, so we need to have human milk products available for those situations."

- Kate Tauber, MD, MA

It is important to note that donor human milk from a milk bank or company is not the same as milk acquired from informal human milk sharing (milk given directly to the mother by another mother). When human milk is directly shared, it is not screened, pasteurized, or tested, so there are increased risks of harmful contaminants. Because of these risks, milk sharing is discouraged.^{15–17}

Human milk-based fortifiers

When a VLBW infant needs more nutrition than MOM or donor milk can provide, human milk fortifiers will be prescribed. Human milk fortifiers are commercially available products (in liquid or powder form) that can be added to human milk to provide the extra nutrients that a premature infant needs to develop and grow. Human milk fortifiers can be made from either donor human milk (human milk-based fortifier and human cream fortifier) or cow's milk (cow's milk-based fortifier); however, importantly, human milk-based fortifiers are associated with fewer complications and better outcomes. 18,19

"An important reason to use human milk-based fortifiers is that preterm babies have difficulty managing fluids and thus need to have their fluids restricted. Commercial products allow us to concentrate the milk with more nutrients in a small volume."

- Jenny Fox, MD, MPH



Human milk-based fortifiers

There are a variety of commercial human milk-based fortifiers available to meet the needs of VLBW infants. Standard human milk-based fortifiers are made by concentrating human donor milk and enriching it with vitamins and minerals. Such fortifiers provide the nutrients VLBW infants need to grow and develop in small volumes that their body can handle. However, some VLBW infants may need more calories than standard human milk-based fortifiers can provide. For these infants, in addition to a human-milk based fortifier, they will also be prescribed a fortifier made with human cream (the high-fat layer of the milk), which has a higher fat content to provide extra calories in a small volume.



While the exact cause of NEC is uncertain, a number of factors have been suggested to be associated with an increased risk of developing NEC, such as not being fed human milk, low birth weight, being born premature and an imbalance of microorganisms in the gut (intestinal dysbiosis).^{22,23} However, many studies have shown that feeding VLBW infants an EHMD can reduce the incidence of NEC, particularly NEC that requires surgery,^{24–33} and reduce their rates of mortality.^{28,31,34}

"At our institution, before we used human milk exclusively in infants that were less than 1,250 grams, our instance of NEC was somewhere around 8 to 10%. When we switched to using only mother's milk or donor milk with human milk-based fortifiers until around 34 weeks of gestational age, we decreased the incidence of NEC to around 2%. It was a dramatic decrease."

- Dan Stewart, MD

Bronchopulmonary dysplasia (BPD)

results in the death of intestinal tissue. It can appear suddenly

and progress quickly, with little to no warning.¹²

Because the lungs of VLBW infants are not fully developed at birth, they are more susceptible to developing bronchopulmonary dysplasia (BPD). Infants with BPD have trouble breathing and need breathing support and oxygen.³⁵ Interestingly, several studies found that feeding VLBW infants an EHMD led to fewer cases of BPD,^{28,36} particularly when there was early use of human milk-based fortifiers.³⁷

Retinopathy of prematurity (ROP)

Retinopathy of prematurity (ROP) primarily affects infants who are born prematurely and/or are very low weight at birth. ROP is caused by the abnormal growth of blood vessels in the retina (a layer of cells in the eye that converts light to nerve signals). While infants with mild cases of ROP may recover healthy vision, those with more severe cases often need surgery and may have vision loss or blindness.³⁸ Similar to NEC and BPD, lower incidences of ROP have been observed in VLBW infants fed an EHMD compared to those fed a diet containing a cow's milk-based fortifier.^{28,39}

Late onset sepsis

Late onset sepsis (LOS) is an infection involving the blood stream that occurs 3 to 28 days after birth.⁴⁰ LOS is a significant cause of morbidity and mortality in preterm infants,⁴¹ with VLBW infants accounting for up to 50% of cases.⁴² Because breast milk, particularly MOM, has positive effects on the immune system and decreases the need for a central line and PN, studies have shown that feeding VLBW infants an EHMD can significantly decrease the incidence of LOS.^{28,34,36,39,43}

Neurodevelopmental deficits

Premature infants are more likely to have neurodevelopmental impairments, leading to problems with behavior and mental health (e.g., autism spectrum disorder, attention deficit hyperactivity disorder, anxiety, depression), motor and sensory issues (e.g., deafness, cerebral palsy), developmental delays (e.g., impaired language and cognition) and poorer academic performance. Such impairments are related to gestational age, with those infants born the earliest having the highest rates of impairment. Furthermore, common comorbidities of VLBW infants, including NEC, BPD and ROP, have been associated with neurodevelopmental deficits in both the short and long term.

Nutrition is thought to play a key role in decreasing neurodevelopmental morbidity associated with preterm birth. Breast milk contains critical nutrients and growth factors that are essential for proper brain development.⁵¹ Accordingly, multiple studies have observed that more consumption of breast milk, including being on an EHMD, in preterm infants results in better neurodevelopmental outcomes, even up to 11 years of age.^{51–57}

"There are all sorts of benefits of a human milk diet that we don't necessarily see in the hospital at the time these babies are born. There are benefits to brain growth and development that are important for overall function and help these kids develop into productive citizens."

- Kate Tauber, MD, MA

Metabolic dysfunction

Many VLBW infants need a period of "catch-up growth" to get to an age-appropriate size. However, rapid catch-up growth has been associated with the development of metabolic disorders, such as metabolic syndrome or diabetes and obesity, later in life.⁵⁸ To avoid such conditions, proper nutrition is of utmost importance. In a study of VLBW infants that were small for their gestational age, being fed an EHMD was found to result in greater catch-up growth without increased risks of insulin resistance or fat deposition.⁵⁹

*** In addition to decreasing the chances of experiencing comorbidities, the use of an EHMD can also shorten the time it takes to hit key care milestones.

Less time to reach full feeds

Due to gut immaturity or other comorbidities, PN may be started for a VLBW infant in the first few hours of life and used as a bridge to provide nutrients until the baby can tolerate getting all its nutrition from enteral feeds. However, PN can be hard on the liver and, due to the need for a central line, is associated with increased chances of infection. Therefore, PN should be tapered off while enteral feeds are incrementally increased to reach full feeds as soon as possible.⁸ Studies have shown that there is less feeding intolerance and fewer days of PN when VLBW infants are on an EHMD compared to a diet containing cow's milk-based products.^{26–28,60,61}

Earlier hospital discharge

As detailed above, premature infants fed an EHMD experience fewer/less severe comorbidities, stop PN earlier and reach full feeds sooner. Accordingly, multiple studies have found that VLBW infants fed an EHMD stay in the hospital fewer days, on average, than similar infants not fed an EHMD.^{26,30,62}





Despite the many benefits of an EHMD for premature infants, the reality is that not all infants who need it have access. This lack of access can be due to a variety of factors.

Cost

Although MOM is the preferred choice for feeding premature infants, it is often unavailable or there is an insufficient supply for it to be the sole source of enteral nutrition. Therefore, donor human milk is needed as a replacement/supplement. While it is thought that there is enough donor human milk to meet the current demand, it is expensive. Part of the high price comes from the screening, processing and testing required to ensure the safety of the milk. Commercially-sourced donor milk and human milk-based fortifiers also undergo additional testing to determine the nutrient content of each batch, further driving up costs.

"Some hospitals can spend over a million dollars a year on donor milk and donor milk fortifier."

- Dan Stewart, MD

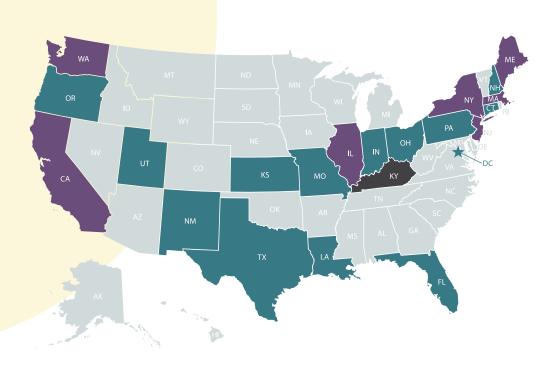
"Access to donor milk banks depends more on your location, but commercial human milk-based products can be shipped anywhere. So, in terms of access, every hospital can have access to human milk, it's just whether or not they want to pay for it."

- Kate Tauber, MD, MA

Variability in donor human milk coverage by private and government-backed (Medicaid) insurers can also increase costs. Although a federal mandate for such coverage has been introduced in the House of Representatives (Supporting Premature Infant Nutrition Act of 2O25; H.R. 4569, 119th Congress), it has not yet been put up for a vote.⁶⁴ Therefore, regulations regarding the degree of coverage of donor human milk and related products by insurance and which insurers are required to supply coverage are determined by individual states. As of this publication, only 22 states and the District of Columbia have passed legislation requiring coverage of donor human milk in some capacity (via Medicaid, private insurance, or both).^{65–72}

States that mandate some insurance coverage of donor human milk⁶⁵

- States requiring coverage by Medicaid only
- States requiring coverage by both private insurers and Medicaid
- States requiring coverage by private insurers only



Disparate access

Unfortunately, access to an EHMD for premature infants is not universal across the US. This lack of access disproportionately affects communities of color, with Black and Hispanic VLBW infants receiving less human milk than similar White infants.⁷³ The reasons for such disparities are multi-factorial. Safety-net hospitals (those with ≥75% Medicaid patients) and hospitals with a high proportion of Black or Hispanic patients are less likely to use donor human milk than non-safety-net hospitals.⁷⁴ Such differences cannot be fully explained by lack of donor milk supply or geography,⁷⁴ suggesting that access may instead be restricted at the hospital level, presumably due to cost. Mothers may also have their own health issues or may not have the support necessary, such as time off work, transportation, or sibling care, to continue to provide MOM for their infant's care.⁷³ Location can also affect EHMD access because smaller rural hospitals are less likely to have donor human milk available.⁷⁵ Furthermore, VLBW infants born in small, rural hospitals who are transferred to large, urban facilities may experience delayed introduction to human milk and less access to MOM due to the need for travel.

"The cutoffs for utilization of human milk-based fortifier may change from one institution to another based on the NEC rate and other preterm morbidity risks versus the cost of human milk-based fortifier compared to the cost of cow's milk-based fortifier."

- Jenny Fox, MD, MPH

"Disparities in care are not solely the product of race, but the result of a complex interplay of systemic factors. Things like payer mix, ownership type and location of hospitals, along with other structural constraints influencing hospitals and care teams, shape the quality and consistency of services and resources patients receive. Equitable access to donor milk is of no exception."

- Carlie Austin, BSN, RN

Lack of education

"Because of the lack of timely parental education regarding the benefits of breast milk by the pediatric and obstetrical community, I don't think most parents understand the importance of an exclusive human milk diet for their infants, especially if they are born prematurely."

- Dan Stewart, MD

One reason that parents may lack education about an EHMD is because the topic comes up late in the pregnancy. This is particularly true when feeding options are discussed for the first time after the baby is born. At this point, both mother and baby may be dealing with health challenges and families may find it difficult to do research and make informed choices about feeding their baby.

Another problem is the lack of a country-wide consensus regarding the optimal nutrition for preterm infants. Without a basic standard, the feeding protocols used for preterm infants can vary widely from hospital to hospital. Preterm infants also tend to have unique nutritional needs due to different combinations of health challenges. Such differences are not always obvious, making it difficult for parents and administrators to understand why one preterm infant needs to be fed differently than another.

"I believe it is a large disservice to not have a federal baseline standard. Baseline standards provide an evidence-informed benchmark that healthcare systems and teams can build upon to meet the unique needs of their NICUs and the infants and families they serve."

- Carlie Austin, BSN, RN

There is also confusion surrounding human milk fortifier. Unfortunately, cow's milk-based fortifier and human milk-based fortifier are both labeled as "human milk fortifier;" therefore, parents may not even be aware that their baby could be consuming a cow's milk-based product. In fact, in a survey of 281 parents who had a baby in the NICU that received human milk fortifier, only 8.8% realized that it could be made from cow's milk. In the same study, out of the 379 healthcare providers surveyed, only 21.9% reported that they consistently inform parents of the source of the fortifier being used, which aligns with only 20.6% of parents reporting knowing the source of their child's fortifier.⁷⁷

"Fortifier terminology can be quite confusing, not just for families, but for many nurse clinicians as well. It is not uncommon for infants to receive cow's milk-based fortifiers, while their families are under the impression that they are receiving human milk. When families are met with opportunities to research the nuances and understand the difference, they can perceive that misinformation was intentionally provided to them. Realizing that their baby was not receiving exclusive human milk can make family members feel like they were misguided by their care team, adding to feelings of mistrust and apprehension."

- Carlie Austin, BSN, RN

Improving Access to an Exclusive Human Milk Diet

Education

One way to improve EHMD access for premature infants is to educate people on its use and benefits. Providing education to families has been shown to increase the number of mothers who intend to breastfeed and can reduce maternal anxiety.¹⁵ Such education may include information on the benefits of MOM, the need for early and frequent milk expression, as well as guidance on pumping and

proper milk handling/storage. It is also essential that this education occurs early in the pregnancy so that any questions can be answered by providers/lactation specialists and feeding decisions can be made by the family. This allows the care team to

plan appropriately for feeding once the baby is born, particularly if the mother is unavailable due to her own care needs (such as needing to undergo surgery) or being located in a different hospital.

"We're trying to do a lot of prenatal education, getting consent for donor milk before delivery and talking about the need for pumping and providing a hospital grade pump to use at home for the first 2 weeks in order to provide as much support to mothers and their families as possible. Providing all that support can be helpful, but it's a struggle."

- Kate Tauber, MD, MA

"The conversation about breastfeeding has to start early. It is really hard to have the discussion after the baby is here and in the NICU. Sometimes moms are still fighting for their lives or they have to go back into surgery, so it could be days before we see them. Even after that, it is hard to think about what to do going forward when there is so much going on in the present."

- Jenny Fox, MD, MPH

As a primary source of health education for patients, care team members also need to be educated regarding the benefits of human milk, breastfeeding practices and the technical aspects of pumping and storing milk so that they can provide appropriate and consistent support to families. Such knowledge can improve patient attitudes towards breastfeeding and human milk as well as reinforce the family's education, resulting in increased use.¹⁵

"We've found that getting the OB clinics and lactation consultants involved in early discussions with mothers around breastfeeding, the benefits of human milk and how they plan to feed their baby after it is born has been helpful. Such intervention has really increased the numbers of mothers that are providing breast milk after their babies are born."

- Jenny Fox, MD, MPH

Education of hospital administrators on the benefits of an EHMD could also result in improved access since they control the adoption of hospital policies, such as infant feeding protocols. In particular, administrators should understand that although the costs of donor human milk and human milk-based fortifiers are higher than cow's milk-based products, an EHMD has been associated with both short- and long-term cost savings for VLBW infants that offset the higher up-front costs. 11,26,30,78-80 One study analyzing cost and complications data from multiple institutions determined that from \$515,113 to \$3,369,515 in annual costs were avoided after EHMD programs were implemented in their NICUs. 11 Such savings can be attributed to fewer comorbidities (particularly surgical NEC), fewer days in the hospital and the avoidance of comorbidity-associated neurodevelopmental and metabolic deficiencies. 11,12,26,30,31,36,39,43,51,79-81

"NEC is one of the biggest complications for preterm infants. It can be hundreds of thousands of dollars to treat a baby with surgical NEC, so avoiding that complication could provide a huge cost savings."

- Kate Tauber, MD, MA

"An EHMD is more expensive when establishing feeds, but several studies have shown that its use actually saves money in the long run. However, convincing hospital administrators of the long-term economic advantage is difficult."

- Dan Stewart, MD



Informational Articles

AAP Policy Statement:
Breastfeeding and the
Use of Human Milk¹⁷

AAP: Promoting Human Milk and Breastfeeding for the Very Low Birth Weight Infant 15

AAP: Importance of Human Milk to the VLBW Infant⁸²

AAP: Donor Human Milk for the High-Risk Infant: Preparation, Safety and Usage Options in the United States¹⁶

Guidelines for Feeding Very Low Birth Weight Infants⁸³

Exclusive Human Milk
Diet: A Challenging
Innovation in Neonatal
Care⁸⁴

National Association of Neonatal Therapists: Benefits of an Exclusive Human Milk Diet (EHMD)

for Premature Infants⁸⁵

Children's Hospital of Philadelphia: Very Low Birthweight⁸⁶

> MSD Manual: Preterm Infants⁸⁷

CDC: Breastfeeding Frequently Asked Questions (FAQ)⁸⁸

Providing insurance coverage

Another way to improve EHMD access is to implement policies that mandate insurance companies and Medicaid to cover human milk-based products (both donor milk and fortifier). Such coverage would establish or improve hospital reimbursement rates, thus decreasing costs for patients. Ideally, such a mandate would have the most effect if it was passed at the national level, but even increasing the number of states addressing EHMD coverage (see page 14) would be an improvement.

"Having a federal baseline reimbursement policy for the EHMD, particularly for Medicaid, would help support hospital leaders to effectively and consistently respond to the needs of vulnerable and underserved infants, without the implications of cost or return on investment being a deciding factor. An EMHD should not be a privilege for some; every infant should have access to clinical excellence."

- Carlie Austin, BSN, RN

"In terms of improving access to an EHMD, I think we need legislation to get reimbursement because I think cost is a huge barrier for a lot of hospitals. More hospitals would provide it if it was reimbursed."

- Kate Tauber, MD, MA

Conclusion

An EHMD, consisting of MOM, donor human milk and human milk-based fortifier, has been consistently associated with fewer complications, lower mortality rates and better long-term development in preterm infants. However, due to a lack of education, higher up-front costs and systemic barriers to access, universal provision of this diet has yet to be achieved. Therefore, steps should be taken to improve public awareness and support policy changes to ensure EHMD access to those that need it most.



References

- Infant Mortality. CDC, Maternal Infant Health. December 12, 2024. Accessed January 28, 2025. https://www.cdc.gov/maternal-infant-health/infant-mortality/index.html
- Preterm Birth. CDC, Maternal Infant Health. November 12, 2024. Accessed January 28, 2025. https://www.cdc.gov/maternal-infant-health/preterm-birth/index.html
- Hamilton BE, Martin JA, Osterman Michelle J. K. Births: Provisional Data for 2024. Published online April 2025. https://www.cdc.gov/nchs/data/vsrr/vsrr038.pdf
- Osterman MJK, Hamilton BE, Martin JA, Driscoll AK, Valenzuela CP. US Centers for Disease Control and Prevention, National Vital Statistics Reports, Births: Final Data for 2023. 2025;74(1). https://www.cdc.gov/nchs/data/nvsr/nvsr74/nvsr74-1.pdf
- Martin JA, Hamilton BE, Osterman MJK. US Centers for Disease Control and Prevention: NCHS Data Brief, Births in the United States, 2023. doi:10.15620/cdc/158789
- Preterm birth. World Health Organization. Accessed January 28, 2025. https://www.who.int/news-room/fact-sheets/detail/ preterm-birth
- Premature Birth. Yale Medicine. Accessed January 28, 2025. https://www.yalemedicine.org/conditions/premature-birth
- Freysdottir D. Parenteral Nutrition for the Preterm Neonate Clinical Pathway. Published online January 7, 2025. https:// www.hopkinsmedicine.org/-/media/files/allchildrens/clinicalpathways/nicu_tpn-clinical-pathway-final_1_7_2025.pdf
- 9. Brune KD, Donn SM. Enteral Feeding of the Preterm Infant. NeoReviews. 2018;19(11):e645-e653. doi:10.1542/neo.19-11-e645
- Shakeel F. Oral Immune Therapy (OIT) with Mother's Own Milk (MOM) for Neonates Clinical Pathway. Published online November 29, 2023. https://www.hopkinsmedicine.org/-/ media/files/allchildrens/clinical-pathways/oral-immunetherapy-11_29_2023.pdf
- Swanson JR, Becker A, Fox J, et al. Implementing an exclusive human milk diet for preterm infants: real-world experience in diverse NICUs. BMC Pediatr. 2023;23(1):237. doi:10.1186/ s12887-023-04047-5
- Necrotizing Enterocolitis (NEC) Working Group of Council | NICHD

 Eunice Kennedy Shriver National Institute of Child Health and
 Human Development. September 19, 2024. Accessed January 28, 2025. https://www.nichd.nih.gov/about/advisory/council/NEC-working-group-of-council
- 13. Martin CR, Ling PR, Blackburn GL. Review of Infant Feeding: Key Features of Breast Milk and Infant Formula. Nutrients. 2016;8(5):279. doi:10.3390/nu8050279
- Jozsa F, Thistle J. Anatomy, Colostrum. In: StatPearls. StatPearls Publishing; 2025. Accessed May 27, 2025. http://www.ncbi.nlm. nih.gov/books/NBK513256/
- Parker MG, Stellwagen LM, Noble L, et al. Promoting Human Milk and Breastfeeding for the Very Low Birth Weight Infant. Pediatrics. 2021;148(5):e2021054272. doi:10.1542/peds.2021-054272
- COMMITTEE ON NUTRITION, SECTION ON BREASTFEEDING, COMMITTEE ON FETUS AND NEWBORN, et al. Donor Human Milk for the High-Risk Infant: Preparation, Safety, and Usage Options in the United States. Pediatrics. 2017;139(1):e20163440. doi:10.1542/peds.2016-3440

- Meek JY, Noble L, Section on Breastfeeding. Policy Statement: Breastfeeding and the Use of Human Milk. Pediatrics. 2022;150(1):e2022057988. doi:10.1542/peds.2022-057988
- Lucas A, Assad M, Sherman J, Moscardin J, Abrams S. Safety of Cow's Milk-Derived Fortifiers Used with an All-Human Milk Base Diet in Very Low Birthweight Preterm Infants -. Neonatol Today. 2020;15(7). Accessed June 16, 2025. https://neonatologytoday. org/archives/2020/07/3145/
- Lucas A, Assad M, Sherman J, Boscardin J, Abrams S. Safety of Cow's Milk-Derived Fortifiers used with an All Human Milk Base Diet in Very Low Birthweight Preterm Infants: Part II. Neonatol Today. 2020;15(10). https://www.neonatologytoday.net/ newsletters/nt-oct20.pdf
- 20. Moak R, Boone N, Eidson N, et al. Exploring the links between necrotizing enterocolitis and cow's milk protein allergy in preterm infants: a narrative review. Front Pediatr. 2023;11:1274146. doi:10.3389/fped.2023.1274146
- Ginglen JG, Butki N. Necrotizing Enterocolitis. In: StatPearls. StatPearls Publishing; 2025. Accessed May 28, 2025. http://www.ncbi.nlm.nih.gov/books/NBK513357/
- Stangland S. FDA, CDC, NIH: Evidence points to lack of human milk, not specialty formulas, as increasing risk of NEC. Published online October 9, 2024. Accessed July 24, 2025. https:// publications.aap.org/aapnews/news/30429/FDA-CDC-NIH-Evidence-points-to-lack-of-human-milk
- Alganabi M, Lee C, Bindi E, Li B, Pierro A. Recent advances in understanding necrotizing enterocolitis. F1000Research. 2019;8:F1000 Faculty Rev-107. doi:10.12688/ f1000research.17228.1
- Herrmann K, Carroll K. An Exclusively Human Milk Diet Reduces Necrotizing Enterocolitis. Breastfeed Med. 2014;9(4):184-190. doi:10.1089/bfm.2013.0121
- Sullivan S, Schanler RJ, Kim JH, et al. An Exclusively Human Milk-Based Diet Is Associated with a Lower Rate of Necrotizing Enterocolitis than a Diet of Human Milk and Bovine Milk-Based Products. J Pediatr. 2010;156(4):562-567.e1. doi:10.1016/j. jpeds.2009.10.040
- Assad M, Elliott MJ, Abraham JH. Decreased cost and improved feeding tolerance in VLBW infants fed an exclusive human milk diet. J Perinatol. 2016;36(3):216-220. doi:10.1038/jp.2015.168
- 27. Cristofalo EA, Schanler RJ, Blanco CL, et al. Randomized Trial of Exclusive Human Milk versus Preterm Formula Diets in Extremely Premature Infants. J Pediatr. 2013;163(6):1592-1595.e1. doi:10.1016/j.jpeds.2013.07.011
- Hair AB, Peluso AM, Hawthorne KM, et al. Beyond Necrotizing Enterocolitis Prevention: Improving Outcomes with an Exclusive Human Milk-Based Diet. Breastfeed Med. 2016;11(2):70-74. doi:10.1089/bfm.2015.0134
- 29. Hair AB, Bergner EM, Lee ML, et al. Premature Infants 750-1,250 g Birth Weight Supplemented with a Novel Human Milk-Derived Cream Are Discharged Sooner. Breastfeed Med. 2016;11(3):133-137. doi:10.1089/bfm.2015.0166
- 30. Ganapathy V, Hay JW, Kim JH. Costs of Necrotizing Enterocolitis and Cost-Effectiveness of Exclusively Human Milk-Based Products in Feeding Extremely Premature Infants. Breastfeed Med. 2012;7(1):29-37. doi:10.1089/bfm.2011.0002

- 31. Huston RK, Markell AM, McCulley EA, et al. Decreasing Necrotizing Enterocolitis and Gastrointestinal Bleeding in the Neonatal Intensive Care Unit: The Role of Donor Human Milk and Exclusive Human Milk Diets in Infants ≤1500 g Birth Weight. ICAN Infant Child Adolesc Nutr. 2014;6(2):86-93. doi:10.1177/1941406413519267
- Sato R, Malai S, Razmjouy B. Necrotizing Enterocolitis Reduction Using an Exclusive Human-Milk Diet and Probiotic Supplementation in Infants With 1000–1499 Gram Birth Weight. Nutr Clin Pract. 2020;35(2):331-334. doi:10.1002/ncp.10394
- Lucas A, Boscardin J, Abrams SA. Preterm Infants Fed Cow's Milk-Derived Fortifier Had Adverse Outcomes Despite a Base Diet of Only Mother's Own Milk. Breastfeed Med. 2020;15(5):297-303. doi:10.1089/bfm.2019.0133
- Abrams SA, Schanler RJ, Lee ML, Rechtman DJ, the Prolacta Study Group. Greater Mortality and Morbidity in Extremely Preterm Infants Fed a Diet Containing Cow Milk Protein Products. Breastfeed Med. 2014;9(6):281-285. doi:10.1089/bfm.2014.0024
- Bronchopulmonary Dysplasia. December 10, 2024. Accessed May 28, 2025. https://www.hopkinsmedicine.org/health/conditionsand-diseases/bronchopulmonary-dysplasia
- 36. Delaney Manthe E, Perks PH, Swanson JR. Team-Based Implementation of an Exclusive Human Milk Diet. Adv Neonatal Care. 2019;19(6):460. doi:10.1097/ANC.0000000000000676
- 37. Huston R, Lee M, Rider E, et al. Early fortification of enteral feedings for infants <1250 grams birth weight receiving a human milk diet including human milk based fortifier. J Neonatal-Perinat Med. 2020;13(2):215-221. doi:10.3233/NPM-190300
- Retinopathy of Prematurity | National Eye Institute. Accessed May 28, 2025. https://www.nei.nih.gov/learn-about-eye-health/eyeconditions-and-diseases/retinopathy-prematurity
- Hanford J, Mannebach K, Ohler A, Patten M, Pardalos J. Rates of Comorbidities in Very Low Birth Weight Infants Fed an Exclusive Human Milk Diet Versus a Bovine Supplemented Diet. Breastfeed Med. 2021;16(10):814-820. doi:10.1089/bfm.2020.0345
- Singh M, Alsaleem M, Gray CP. Neonatal Sepsis. In: StatPearls. StatPearls Publishing; 2025. Accessed May 28, 2025. http://www.ncbi.nlm.nih.gov/books/NBK531478/
- 41. Flannery DD, Edwards EM, Coggins SA, Horbar JD, Puopolo KM. Late-Onset Sepsis Among Very Preterm Infants. Pediatrics. 2022;150(6):e2022058813. doi:10.1542/peds.2022-058813
- 42. Coggins SA, Glaser K. Updates in Late-Onset Sepsis: Risk Assessment, Therapy and Outcomes. NeoReviews. 2022;23(11):738-755. doi:10.1542/neo.23-10-e738
- O'Connor DL, Kiss A, Tomlinson C, et al. Nutrient enrichment of human milk with human and bovine milk-based fortifiers for infants born weighing <1250 g: a randomized clinical trial. Am J Clin Nutr. 2018;108(1):108-116. doi:10.1093/ajcn/nqy067
- Hee Chung E, Chou J, Brown KA. Neurodevelopmental outcomes of preterm infants: a recent literature review. Transl Pediatr. 2020;9(Suppl 1):S3-S8. doi:10.21037/tp.2019.09.10
- 45. Song IG. Neurodevelopmental outcomes of preterm infants. Clin Exp Pediatr. 2023;66(7):281-287. doi:10.3345/cep.2022.00822
- Hickey M, Georgieff M, Ramel S. Neurodevelopmental outcomes following necrotizing enterocolitis. Semin Fetal Neonatal Med. 2018;23(6):426-432. doi:10.1016/j.siny.2018.08.005
- 47. DeMauro SB. Neurodevelopmental outcomes of infants with bronchopulmonary dysplasia. Pediatr Pulmonol. 2021;56(11):3509-3517. doi:10.1002/ppul.25381
- Choi YJ, Hong EH, Shin YU, Bae GH, Kim I, Cho H. Severe Retinopathy of Prematurity Associated With Neurodevelopmental Disorder in Children. Front Pediatr. 2022;10:816409. doi:10.3389/fped.2022.816409

- Ahn JH, Lee KM, Kim MJ, et al. Neurodevelopmental outcomes in very low birthweight infants with retinopathy of prematurity in a nationwide cohort study. Sci Rep. 2022;12(1):5053. doi:10.1038/ s41598-022-09053-8
- 50. Sha C, Jin Z, Ku SY, et al. Necrotizing Enterocolitis and Neurodevelopmental Impairments: Microbiome, Gut, and Brain Entanglements. Biomolecules. 2024;14(10):1254. doi:10.3390/biom14101254
- Skinner AM, Narchi H. Preterm nutrition and neurodevelopmental outcomes. World J Methodol. 2021;11(6):278-293. doi:10.5662/wjm.v11.i6.278
- 52. Hair AB, Patel AL, Kiechl-Kohlendorfer U, et al. Neurodevelopmental outcomes of extremely preterm infants fed an exclusive human milk-based diet versus a mixed human milk + bovine milk-based diet: a multi-center study. J Perinatol. 2022;42(11):1485-1488. doi:10.1038/s41372-022-01513-3
- Bergner EM, Shypailo R, Visuthranukul C, et al. Growth, Body Composition, and Neurodevelopmental Outcomes at 2 Years Among Preterm Infants Fed an Exclusive Human Milk Diet in the Neonatal Intensive Care Unit: A Pilot Study. Breastfeed Med. 2020;15(5):304-311. doi:10.1089/bfm.2019.0210
- 54. Belfort MB, Anderson PJ, Nowak VA, et al. Breast Milk Feeding, Brain Development, and Neurocognitive Outcomes: A 7-Year Longitudinal Study in Infants Born at Less Than 30 Weeks' Gestation. J Pediatr. 2016;177:133-139.e1. doi:10.1016/j.jpeds.2016.06.045
- Patra K, Hamilton M, Johnson T, et al. NICU Human Milk Dose and 20-Month Neurodevelopmental Outcome in Very Low Birth Weight Infants. Neonatology. 2017;112(4):330-336. doi:10.1159/000475834
- 56. Chou FS, Zhang J, Villosis MFB, Lakshmanan A. Exclusive human milk diet is associated with lower risk of motor function impairment at three years of corrected age. J Perinatol. Published online April 21, 2025. doi:10.1038/s41372-025-02296-z
- 57. Johnson S, Wolke D, Hennessy E, and Marlow N. Educational Outcomes in Extremely Preterm Children: Neuropsychological Correlates and Predictors of Attainment. Dev Neuropsychol. 2011;36(1):74-95. doi:10.1080/87565641.2011.540541
- Veening MA, Van Weissenbruch MM, Delemarre-Van De Waal HA. Glucose tolerance, insulin sensitivity, and insulin secretion in children born small for gestational age. J Clin Endocrinol Metab. 2002;87(10):4657-4661. doi:10.1210/jc.2001-011940
- Visuthranukul C, Abrams SA, Hawthorne KM, Hagan JL, Hair AB. Premature small for gestational age infants fed an exclusive human milk-based diet achieve catch-up growth without metabolic consequences at 2 years of age. Arch Dis Child Fetal Neonatal Ed. 2019;104(3):F242-F247. doi:10.1136/archdischild-2017-314547
- 60. Gates A, Thompson AB, Marin T, Waller JL, Patel J, Stansfield BK. Novel multinutrient human milk-based human milk fortifier promotes growth and tolerance in premature infants. J Parenter Enter Nutr. 2022;46(4):818-827. doi:10.1002/jpen.2249
- 61. Wickland J, Wade C, Micetic B, Meredith K, Martin G. A Retrospective Analysis of the Effects of an Exclusively Human Milk Protein Diet on Neonatal Feeding Tolerance. Am J Perinatol. 2022;39(9):995-1000. doi:10.1055/s-0040-1721374
- 62. Tetarbe M, Chang MR, Barton L, Cayabyab R, Ramanathan R. Economic and Clinical Impact of Using Human Milk-Derived Fortifier in Very Low Birth Weight Infants. Breastfeed Med. 2024;19(2):114-119. doi:10.1089/bfm.2023.0163
- 63. Carroll K, Herrmann KR. The Cost of Using Donor Human Milk in the NICU to Achieve Exclusively Human Milk Feeding Through 32 Weeks Postmenstrual Age. Breastfeed Med. 2013;8(3):286-290. doi:10.1089/bfm.2012.0068

- 64. Rep. McGarvey M [D K 3. Committees H.R.4569 119th Congress (2025-2026): Supporting Premature Infant Nutrition Act of 2025. July 21, 2025. Accessed September 16, 2025. https://www.congress.gov/bill/119th-congress/house-bill/4569/committees
- 65. Speer K. Donor Human Milk: More Valuable Than Gold? National Conference of State Legislatures. November 21, 2022. Accessed January 30, 2025. https://www.ncsl.org/state-legislatures-news/details/donor-human-milk-more-valuable-than-gold
- University of California Health Milk Bank. University of California Health. September 16, 2025. Accessed September 17, 2025. https://health.universityofcalifornia.edu/patient-care/milk-bank
- 67. Title 24-A, §4320-V: Coverage for donor breast milk.

 Accessed September 17, 2025. https://legislature.maine.gov/statutes/24-A/title24-Asec4320-V.html
- Donor Breast Milk Coverage for Infants Under 12 Months, CR 113541 | Department of Health and Human Services. Maine DHHS. December 22, 2022. Accessed September 17, 2025. https://www.maine.gov/dhhs/oms/providers/provider-bulletins/donor-breast-milk-coverage-infants-under-12-months-cr-113541-2022-12-22
- 69. 2024 New Hampshire Revised Statutes :: Title X Public Health :: Chapter 126-A Department of Health and Human Services :: Section 126-A:101 Medicaid Coverage of Donor Breast Milk; Reimbursement Required. Justia Law. Accessed September 17, 2025. https://law.justia.com/codes/new-hampshire/title-x/chapter-126-a/section-126-a-101/
- 70. State of New Mexico Medical Assistance Program Manual Supplement. August 9, 2023. https://www.hca.nm.gov/wp-content/uploads/Supplement-23-06-Human-Donor-Milk-Billing-Guidance-in-Inpatient-Hospital-FINAL.pdf
- Mothers' Milk Bank of Louisiana at Ochsner | Ochsner Health. Ochsner Health System. August 26, 2015. Accessed September 17, 2025. https://www.ochsner.org/services/mothers-milk-bankat-ochsner-baptist/
- 72. Mass. General Laws c.32A § 17V | Mass.gov. Accessed September 17, 2025. https://www.mass.gov/info-details/mass-general-laws-c32a-ss-17v
- 73. Goldstein GP, Pai VV, Liu J, et al. Racial/ethnic disparities and human milk use in necrotizing enterocolitis. Pediatr Res. 2020;88(Suppl 1):3-9. doi:10.1038/s41390-020-1073-5
- 74. Rose AT, Miller ER, Butler M, et al. US state policies for Medicaid coverage of donor human milk. J Perinatol. 2022;42(6):829-834. doi:10.1038/s41372-022-01375-9
- Boundy EO. Donor Human Milk Use in Advanced Neonatal Care Units – United States, 2020. MMWR Morb Mortal Wkly Rep. 2022;71. doi:10.15585/mmwr.mm7133a1

- 76. Meiliana M, Alexander T, Bloomfield FH, et al. Nutrition guidelines for preterm infants: A systematic review. J Parenter Enter Nutr. 2024;48(1):11-26. doi:10.1002/jpen.2568
- Canvasser J, Hair AB, Kim JH, Taylor SN. Parent and Provider Perspectives on the Imprecise Label of "Human Milk Fortifier" in the NICU. Nutrients. 2020;12(3):720. doi:10.3390/nu12030720
- Johnson TJ, Patel AL, Bigger HR, Engstrom JL, Meier PP. Economic Benefits and Costs of Human Milk Feedings: A Strategy to Reduce the Risk of Prematurity-Related Morbidities in Very-Low-Birth-Weight Infants. Adv Nutr. 2014;5(2):207-212. doi:10.3945/an.113.004788
- Hampson G, Roberts SLE, Lucas A, Parkin D. An economic analysis of human milk supplementation for very low birth weight babies in the USA. BMC Pediatr. 2019;19(1):337. doi:10.1186/s12887-019-1691-4
- 80. Goldstein M. Open Letter from The National Coalition for Infant Health (NCfIH) Establishing Exclusively Human Milk for Very Low Birthweight Babies as Our Nation's Standard of Care.
 Neonatol TODAY. Published online March 2018.
- 81. Mizuno K, Shimizu T, Ida S, et al. Policy statement of enteral nutrition for preterm and very low birthweight infants. Pediatr Int. 2020;62(2):124-127. doi:10.1111/ped.14067
- 82. Nutrition for the Preterm, VLBW Infant After NICU Discharge. Accessed June 5, 2025. https://www.aap.org/en/patient-care/newborn-and-infant-nutrition/nutrition-for-the-preterm-vlbw-infant-after-nicu-discharge/
- 83. Dutta S, Singh B, Chessell L, et al. Guidelines for Feeding Very Low Birth Weight Infants. Nutrients. 2015;7(1):423-442. doi:10.3390/nu7010423
- 84. Marchiori GN, and Soria EA. Exclusive human milk diet: a challenging innovation in neonatal care. J Med Econ. 2025;28(1):124-126. doi:10.1080/13696998.2024.2445431
- 85. Chris BB. Benefits of an Exclusive Human Milk Diet (EHMD) for Premature Infants. National Association of Neonatal Therapists. November 3, 2020. Accessed June 5, 2025. https://neonataltherapists.com/benefits-of-an-exclusive-human-milk-diet-ehmd-for-premature-infants/
- Children's Hospital of Philadelphia. Very Low Birthweight |
 Children's Hospital of Philadelphia. Accessed June 5, 2025.
 https://www.chop.edu/conditions-diseases/very-low-birthweight
- 87. Preterm Infants Pediatrics. MSD Manual Professional Edition. Accessed June 5, 2025. https://www.msdmanuals.com/professional/pediatrics/perinatal-problems/preterm-infants
- 88. CDC. Breastfeeding Frequently Asked Questions (FAQ). Breastfeeding. July 29, 2024. Accessed June 5, 2025. https://www.cdc.gov/breastfeeding/php/faq/faq.html



The National Coalition for Infant Health is a collaborative of professional, clinical, community and family support organizations.

The coalition focuses on education and advocacy promoting patient-centered care for all infants—whether born preterm or full term—and their families.

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